UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

CONSERVATION LAW FOUNDATION, INC.,)))
Plaintiff,)
v.) CIVIL ACTION NO. 1:24-CV-11766-RGS)
CHELSEA SANDWICH LLC and GLOBAL COMPANIES LLC,)))
Defendants.))

THIRD DECLARATION OF THOMAS HENDERSON

I, Thomas Henderson, declare as follows:

Background

- 1. I am making this declaration to further supplement my May 28, 2025 and June 20, 2025 declarations in this matter.
- 2. I make this Declaration based upon my personal knowledge and review of records kept in the ordinary course of Roux's business.

The Newterra System at the Chelsea Facility

- 3. As of June 16, 2025, the eight-week outfall testing regimen required by the Environmental Protection Agency's August 2024 Administrative Order on Consent ("Order") was completed. As a result, effluent testing at the Chelsea Facility returned to being conducted per the NPDES permit's requirements, typically monthly for most parameters.
- 4. The July monthly effluent sampling after treatment through the Newterra System occurred on July 2, 2025. All effluent parameters covered under the Chelsea Permit and the Order were measured as non-detect or under permit limits. A true and correct copy of the July

10, 2025 Analytical Report prepared for Roux documenting these successful results is attached as **Exhibit Q**.

- 5. The August monthly effluent sampling occurred on August 4, 2025. In that sample all effluent parameters covered under the Chelsea Permit and the Order were measured as non-detect or under permit limits. A true and correct copy of the August 7, 2025 Analytical Report prepared for Roux documenting these successful results is attached as **Exhibit R**.
- 6. Exhibit S is a summary chart prepared by Roux showing the consolidated effluent sampling results from the samples taken between April 22 and August 4, 2025, which includes pretreatment and post-treatment results. As shown in the summary chart and underlying reports, all contaminants were below permit limits or were non-detect, and the Newterra System successfully reduced several contaminants to below permit limits as shown by comparing the pre- and post-treatment results.
- 7. Chelsea Sandwich submitted a revised Stormwater Pollution Prevention Plan ("SWPPP") to EPA and MassDEP on June 30, 2025, to reflect the installation of the Newterra System, as required by Paragraph IV.4 of the Order. A true and correct copy of the email submitting the SWPPP (without attachment due to size) is attached as **Exhibit T**.

[Remainder of Page Intentionally Blank]

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: August 22, 2025

Thomas Henderson

EXHIBIT Q

ANALYTICAL REPORT

PREPARED FOR

Attn: Tom Henderson Roux Associates Inc 200 Summit Drive Suite 500 Burlington, Massachusetts 01803

Generated 7/10/2025 5:18:57 PM

JOB DESCRIPTION

Chelsea Sandwich, LLC - Chelsea, MA

JOB NUMBER

620-27304-1

Eurofins Rhode Island 646 Camp Ave North Kingstown RI 02852

Eurofins Rhode Island

Job Notes

This report may not be reproduced except in full, and with written approval from the laboratory. The results relate only to the samples tested. For questions please contact the Project Manager at the e-mail address or telephone number listed on this page.

The test results in this report relate only to the samples as received by the laboratory and will meet all requirements of the methodology, with any exceptions noted. This report shall not be reproduced except in full, without the express written approval of the laboratory. All questions should be directed to the Eurofins Environment Testing Northeast, LLC Project Manager.

Authorization

Generated 7/10/2025 5:18:57 PM

Authorized for release by Agnes Huntley, Project Manager Agnes.Huntley@et.eurofinsus.com (401)267-4374

Page 2 of 24

Client: Roux Associates Inc

Laboratory Job ID: 620-27304-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Table of Contents

Cover Page	1
Table of Contents	3
Definitions/Glossary	4
Case Narrative	5
Detection Summary	6
Client Sample Results	7
Surrogate Summary	9
QC Sample Results	10
QC Association Summary	15
Lab Chronicle	17
Certification Summary	18
Method Summary	19
Sample Summary	20
Chain of Custody	21
Receipt Checklists	23

Definitions/Glossary

Client: Roux Associates Inc Job ID: 620-27304-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Qualifiers

General Chemistry

Qualifier Description

*- LCS and/or LCSD is outside acceptance limits, low biased.

Glossary

Abbreviation These commonly used abbreviations may or may not be present in this report.

Listed under the "D" column to designate that the result is reported on a dry weight basis

%R Percent Recovery
CFL Contains Free Liquid
CFU Colony Forming Unit
CNF Contains No Free Liquid

DER Duplicate Error Ratio (normalized absolute difference)

Dil Fac Dilution Factor

DL Detection Limit (DoD/DOE)

DL, RA, RE, IN Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample

DLC Decision Level Concentration (Radiochemistry)

EDL Estimated Detection Limit (Dioxin)

LOD Limit of Detection (DoD/DOE)

LOQ Limit of Quantitation (DoD/DOE)

MCL EPA recommended "Maximum Contaminant Level"

MDA Minimum Detectable Activity (Radiochemistry)

MDC Minimum Detectable Concentration (Radiochemistry)

MDL Method Detection Limit
ML Minimum Level (Dioxin)
MPN Most Probable Number
MQL Method Quantitation Limit

NC Not Calculated

ND Not Detected at the reporting limit (or MDL or EDL if shown)

NEG Negative / Absent
POS Positive / Present

PQL Practical Quantitation Limit

PRES Presumptive
QC Quality Control

RER Relative Error Ratio (Radiochemistry)

RL Reporting Limit or Requested Limit (Radiochemistry)

RPD Relative Percent Difference, a measure of the relative difference between two points

TEF Toxicity Equivalent Factor (Dioxin)
TEQ Toxicity Equivalent Quotient (Dioxin)

TNTC Too Numerous To Count

Eurofins Rhode Island

Page 4 of 24 7/10/2025

Case Narrative

Client: Roux Associates Inc Job ID: 620-27304-1

Project: Chelsea Sandwich, LLC - Chelsea, MA

Job ID: 620-27304-1 Eurofins Rhode Island

Job Narrative 620-27304-1

Analytical test results meet all requirements of the associated regulatory program listed on the Accreditation/Certification Summary Page unless otherwise noted under the individual analysis. Data qualifiers and/or narrative comments are included to explain any exceptions, if applicable.

- Matrix QC may not be reported if insufficient sample is provided or site-specific QC samples were not submitted. In these
 situations, to demonstrate precision and accuracy at a batch level, a LCS/LCSD may be performed, unless otherwise
 specified in the method.
- Surrogate and/or isotope dilution analyte recoveries (if applicable) which are outside of the QC window are confirmed unless attributed to a dilution or otherwise noted in the narrative.

Regulated compliance samples (e.g. SDWA, NPDES) must comply with the associated agency requirements/permits.

Receipt

The samples were received on 7/2/2025 4:30 PM. Unless otherwise noted below, the samples arrived in good condition, and, where required, properly preserved and on ice. The temperature of the cooler at receipt time was 0.6°C.

GC/MS VOA

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

GC/MS Semi VOA

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

Metals

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

General Chemistry

Method 1664B: The laboratory control sample duplicate (LCSD) associated with preparation batch 620-50184 and analytical batch 620-50210 was outside acceptance criteria. The batch laboratory control sample (LCS) was within acceptance limits and may be used to evaluate matrix performance.

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

Eurofins Rhode Island

Page 5 of 24 7/10/2025

Detection Summary

Client: Roux Associates Inc Job ID: 620-27304-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Client Sample ID: CS-001 Lab Sample ID: 620-27304-1

Analyte	Result Qualifier	RL	Unit	Dil Fac [Method	Prep Type
Zinc	22.4	16.0	ug/L		200.8	Total/NA
Turbidity	0.40	0.30	NTU	1	180.1	Total/NA
Ammonia as N	0.184	0.100	mg/L	1	EPA 350.1	Total/NA

Client Sample ID: Aquip-INF Lab Sample ID: 620-27304-2

Analyte	Result Qualifier	RL	Unit	Dil Fac D	Method	Prep Type
Copper	13.3	4.00	ug/L		200.8	Total/NA
Zinc	34.8	16.0	ug/L	1	200.8	Total/NA
Ammonia as N	1.02	0.100	mg/L	1	EPA 350.1	Total/NA
Total Suspended Solids	15.0	10.0	ma/l	1	SM 2540D	Total/NA

7/10/2025

Client Sample Results

Client: Roux Associates Inc Job ID: 620-27304-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Lab Sample ID: 620-27304-1 **Client Sample ID: CS-001**

Date Collected: 07/02/25 09:00 **Matrix: Water** Date Received: 07/02/25 16:30

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Benzene	ND		1.00	ug/L			07/03/25 17:33	1
Surrogate	%Recovery	Qualifier	Limits			Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene (Surr)	101		70 - 130				07/03/25 17:33	1
Toluene-d8 (Surr)	98		70 - 130				07/03/25 17:33	1
1,2-Dichloroethane-d4 (Surr)	102		70 - 130				07/03/25 17:33	1
Dibromofluoromethane (Surr)	106		70 120				07/02/25 17:22	

700		70 - 750				01/03/23 11.33	,
Semivolatile Ord	anic Com	pounds GC/MS	(SIM)				
•		RL	Unit	D	Prepared	Analyzed	Dil Fac
ND		0.0463	ug/L		07/03/25 17:08	07/09/25 01:14	1
ND		0.0463	ug/L		07/03/25 17:08	07/09/25 01:14	1
ND		0.0463	ug/L		07/03/25 17:08	07/09/25 01:14	1
ND		0.0463	ug/L		07/03/25 17:08	07/09/25 01:14	1
ND		0.0463	ug/L		07/03/25 17:08	07/09/25 01:14	1
ND		0.0463	ug/L		07/03/25 17:08	07/09/25 01:14	1
ND		0.0463	ug/L		07/03/25 17:08	07/09/25 01:14	1
ND		0.0463	ug/L		07/03/25 17:08	07/09/25 01:14	1
%Recovery	Qualifier	Limits			Prepared	Analyzed	Dil Fac
42		30 - 130			07/03/25 17:08	07/09/25 01:14	1
41		30 - 130			07/03/25 17:08	07/09/25 01:14	1
62		30 - 130			07/03/25 17:08	07/09/25 01:14	1
	Result ND	Result Qualifier ND ND ND ND ND ND ND ND ND N	ND 0.0463 ND 0.0463	Result Qualifier RL Unit Un	Result Qualifier RL Unit D	Result Qualifier RL Unit D Prepared 07/03/25 17:08 ND 0.0463 ug/L 07/03/25 17:08 Prepared 42 30 - 130 07/03/25 17:08 07/03/25 17:08 41 30 - 130 07/03/25 17:08 07/03	ND 0.0463 ug/L 07/03/25 17:08 07/09/25 01:14 ND 0.0463 ug/L 07/03/25 17:08 07/09/25 01

Method: EPA 200.8 - Metals	s (ICP/MS)						
Analyte	Result Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Copper	ND -	4.00	ug/L		07/02/25 18:05	07/08/25 12:37	1
Zinc	22.4	16.0	ug/L		07/02/25 18:05	07/08/25 12:37	1
General Chemistry							
Analyte	Result Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac

Oil & Grease (1664B)	ND *-	1.9	mg/L	07/08/25 10:45	07/08/25 16:17	1
Turbidity (EPA 180.1)	0.40	0.30	NTU		07/03/25 13:02	1
Chemical Oxygen Demand (EPA 410.4)	ND	10.0	mg/L	07/10/25 09:31	07/10/25 16:08	1
Ammonia as N (EPA 350.1)	0.184	0.100	mg/L		07/07/25 14:16	1
Total Suspended Solids (SM 2540D)	ND	5.00	mg/L		07/03/25 16:20	1

Client Sample Results

Client: Roux Associates Inc Job ID: 620-27304-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Client Sample ID: Aquip-INF

Date Collected: 07/02/25 09:10 Date Received: 07/02/25 16:30

Lab Sample ID: 620-27304-2

Matrix: Water

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Benzene	ND		1.00	ug/L			07/03/25 17:56	1
Surrogate	%Recovery	Qualifier	Limits			Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene (Surr)	100		70 - 130				07/03/25 17:56	1
Toluene-d8 (Surr)	98		70 - 130				07/03/25 17:56	1
1,2-Dichloroethane-d4 (Surr)	105		70 - 130				07/03/25 17:56	1
Dibromofluoromethane (Surr)	110		70 - 130				07/03/25 17:56	1

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Benzo[a]anthracene	ND		0.0463	ug/L		07/03/25 17:08	07/09/25 01:43	1
Benzo[a]pyrene	ND		0.0463	ug/L		07/03/25 17:08	07/09/25 01:43	1
Benzo[b]fluoranthene	ND		0.0463	ug/L		07/03/25 17:08	07/09/25 01:43	1
Benzo[k]fluoranthene	ND		0.0463	ug/L		07/03/25 17:08	07/09/25 01:43	1
Chrysene	ND		0.0463	ug/L		07/03/25 17:08	07/09/25 01:43	1
Dibenz(a,h)anthracene	ND		0.0463	ug/L		07/03/25 17:08	07/09/25 01:43	1
Indeno[1,2,3-cd]pyrene	ND		0.0463	ug/L		07/03/25 17:08	07/09/25 01:43	1
Naphthalene	ND		0.0463	ug/L		07/03/25 17:08	07/09/25 01:43	1
Surrogate	%Recovery	Qualifier	Limits			Prepared	Analyzed	Dil Fac
2-Fluorobiphenyl (Surr)	48		30 - 130			07/03/25 17:08	07/09/25 01:43	1
Terphenyl-d14	58		30 - 130			07/03/25 17:08	07/09/25 01:43	1
Benzo(e)pyrene-d12	88		30 - 130			07/03/25 17:08	07/09/25 01:43	1

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Copper	13.3		4.00	ug/L		07/02/25 18:05	07/08/25 12:45	1
Zinc	34.8		16.0	ug/L		07/02/25 18:05	07/08/25 12:45	1
- General Chemistry								
Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Ammonia as N (EPA 350.1)	1.02		0.100	mg/L			07/07/25 14:18	1
Total Suspended Solids (SM 2540D)	15.0		10.0	mg/L			07/03/25 16:20	1

Surrogate Summary

Client: Roux Associates Inc Job ID: 620-27304-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Method: 624.1 - Volatile Organic Compounds (GC/MS)

Matrix: Water Prep Type: Total/NA

			Pe	ercent Surre	ogate Reco
		BFB	TOL	DCA	DBFM
Lab Sample ID	Client Sample ID	(70-130)	(70-130)	(70-130)	(70-130)
620-27304-1	CS-001	101	98	102	106
620-27304-2	Aquip-INF	100	98	105	110
LCS 620-50028/4	Lab Control Sample	102	100	108	109
LCSD 620-50028/5	Lab Control Sample Dup	103	100	107	108
MB 620-50028/7	Method Blank	99	94	111	109
Cuma mata I amand					

Surrogate Legend

BFB = 4-Bromofluorobenzene (Surr)

TOL = Toluene-d8 (Surr)

DCA = 1,2-Dichloroethane-d4 (Surr)
DBFM = Dibromofluoromethane (Surr)

Method: 625.1 SIM - Semivolatile Organic Compounds GC/MS (SIM)

Matrix: Water Prep Type: Total/NA

		Percent Surrogate Recovery (Acceptance Limits)					
		FBP	TPHL	BePd12			
Lab Sample ID	Client Sample ID	(30-130)	(30-130)	(30-130)			
620-27304-1	CS-001	42	41	62			
620-27304-2	Aquip-INF	48	58	88			
LCS 620-50071/4-A	Lab Control Sample	50	59	82			
LCSD 620-50071/5-A	Lab Control Sample Dup	50	69	95			
MB 620-50071/1-A	Method Blank	47	59	88			

Surrogate Legend

FBP = 2-Fluorobiphenyl (Surr)

TPHL = Terphenyl-d14

BePd12 = Benzo(e)pyrene-d12

Eurofins Rhode Island

7/10/2025

Page 9 of 24

2

2

4

O

Q

10

12

13

14

Client: Roux Associates Inc Job ID: 620-27304-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Method: 624.1 - Volatile Organic Compounds (GC/MS)

Lab Sample ID: MB 620-50028/7 Client Sample ID: Method Blank

Matrix: Water

Analysis Batch: 50028

Prep Type: Total/NA

MB MB Analyte Result Qualifier RL Unit Analyzed Dil Fac D Prepared Benzene ND 1.00 ug/L 07/03/25 11:29

MB MB Surrogate %Recovery Qualifier Limits Prepared Analyzed Dil Fac 4-Bromofluorobenzene (Surr) 99 70 - 130 07/03/25 11:29 Toluene-d8 (Surr) 94 70 - 130 07/03/25 11:29 1,2-Dichloroethane-d4 (Surr) 111 70 - 130 07/03/25 11:29 Dibromofluoromethane (Surr) 70 - 130 07/03/25 11:29 109

Lab Sample ID: LCS 620-50028/4 **Client Sample ID: Lab Control Sample Matrix: Water** Prep Type: Total/NA

Analysis Batch: 50028

	Spike	LCS	LCS			%Rec	
Analyte	Added	Result	Qualifier Unit	D	%Rec	Limits	
Benzene	20.0	17.90	ug/L		90	65 - 135	

LCS LCS Surrogate %Recovery Qualifier Limits 4-Bromofluorobenzene (Surr) 70 - 130 102 Toluene-d8 (Surr) 100 70 - 130 1,2-Dichloroethane-d4 (Surr) 108 70 - 130 Dibromofluoromethane (Surr) 109 70 - 130

Lab Sample ID: LCSD 620-50028/5 Client Sample ID: Lab Control Sample Dup Prep Type: Total/NA

Matrix: Water

Analysis Batch: 50028

	Spike	LCSD	LCSD				%Rec		RPD
Analyte	Added	Result	Qualifier	Unit	D	%Rec	Limits	RPD	Limit
Benzene	20.0	18.03		ug/L		90	65 - 135	1	

LCSD LCSD %Recovery Qualifier Surrogate Limits 70 - 130 4-Bromofluorobenzene (Surr) 103 Toluene-d8 (Surr) 100 70 - 130 107 70 - 130 1,2-Dichloroethane-d4 (Surr) Dibromofluoromethane (Surr) 108 70 - 130

Method: 625.1 SIM - Semivolatile Organic Compounds GC/MS (SIM)

Lab Sample ID: MB 620-50071/1-A Client Sample ID: Method Blank **Matrix: Water** Prep Type: Total/NA

Analysis Batch: 50125 Prep Batch: 50071 MD MD

	IVID IVID						
Analyte	Result Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Benzo[a]anthracene	ND ND	0.0500	ug/L		07/03/25 17:08	07/07/25 16:35	1
Benzo[a]pyrene	ND	0.0500	ug/L		07/03/25 17:08	07/07/25 16:35	1
Benzo[b]fluoranthene	ND	0.0500	ug/L		07/03/25 17:08	07/07/25 16:35	1
Benzo[k]fluoranthene	ND	0.0500	ug/L		07/03/25 17:08	07/07/25 16:35	1
Chrysene	ND	0.0500	ug/L		07/03/25 17:08	07/07/25 16:35	1
Dibenz(a,h)anthracene	ND	0.0500	ug/L		07/03/25 17:08	07/07/25 16:35	1
Indeno[1,2,3-cd]pyrene	ND	0.0500	ug/L		07/03/25 17:08	07/07/25 16:35	1

Eurofins Rhode Island

7/10/2025

Page 10 of 24

Client: Roux Associates Inc Job ID: 620-27304-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Method: 625.1 SIM - Semivolatile Organic Compounds GC/MS (SIM) (Continued)

Lab Sample ID: MB 620-50071/1-A Client Sample ID: Method Blank Prep Type: Total/NA **Matrix: Water** Prep Batch: 50071 **Analysis Batch: 50125**

MB MB Analyte Result Qualifier RL Unit Prepared Analyzed Dil Fac ug/L Naphthalene ND 0.0500 07/03/25 17:08 07/07/25 16:35

MB MB Surrogate %Recovery Qualifier Limits Prepared Analyzed Dil Fac 2-Fluorobiphenyl (Surr) 47 30 - 130 07/03/25 17:08 07/07/25 16:35 Terphenyl-d14 59 30 - 130 07/03/25 17:08 07/07/25 16:35 Benzo(e)pyrene-d12 88 30 - 130 07/03/25 17:08 07/07/25 16:35

Lab Sample ID: LCS 620-50071/4-A Client Sample ID: Lab Control Sample **Matrix: Water** Prep Type: Total/NA

Naphthalene

Analysis Batch: 50125 Prep Batch: 50071

	Spike	LCS	LCS				%Rec	
Analyte	Added	Result	Qualifier	Unit	D	%Rec	Limits	
Benzo[a]anthracene	4.00	3.651		ug/L		91	33 - 143	
Benzo[a]pyrene	4.00	3.664		ug/L		92	17 - 163	
Benzo[b]fluoranthene	4.00	3.105		ug/L		78	24 - 159	
Benzo[k]fluoranthene	4.00	3.358		ug/L		84	11 - 162	
Chrysene	4.00	2.868		ug/L		72	17 - 168	
Dibenz(a,h)anthracene	4.00	3.441		ug/L		86	10 - 227	
Indeno[1,2,3-cd]pyrene	4.00	3.344		ug/L		84	10 - 171	
Naphthalene	4.00	2.843		ug/L		71	21 - 133	

LCS LCS Surrogate %Recovery Qualifier Limits 2-Fluorobiphenyl (Surr) 30 - 130 50 59

30 - 130 Terphenyl-d14 Benzo(e)pyrene-d12 82 30 - 130

Lab Sample ID: LCSD 620-50071/5-A Client Sample ID: Lab Control Sample Dup **Matrix: Water Prep Type: Total/NA**

Analysis Batch: 50125 Prep Batch: 50071 Spike LCSD LCSD %Rec **RPD** Added Analyte Result Qualifier Unit D %Rec Limits **RPD** Limit Benzo[a]anthracene 4.00 4.194 ug/L 105 33 - 143 53 Benzo[a]pyrene 4.00 4.221 106 17 - 163 72 ug/L 14 ug/L Benzo[b]fluoranthene 4.00 3.574 89 24 - 159 14 71 4.00 96 11 - 162 Benzo[k]fluoranthene 3.849 ug/L 14 63 Chrysene 4.00 3.274 ug/L 82 17 - 168 87 Dibenz(a,h)anthracene 4.00 3.719 ug/L 93 10 - 227 8 126 4.00 92 Indeno[1,2,3-cd]pyrene 3.673 ug/L 10 - 171 9 99

2.766

ug/L

69

21 - 133

4.00

LCSD LCSD Surrogate %Recovery Qualifier Limits 2-Fluorobiphenyl (Surr) 50 30 - 130 Terphenyl-d14 69 30 - 130 95 30 - 130 Benzo(e)pyrene-d12

3

Client: Roux Associates Inc Job ID: 620-27304-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Method: 200.8 - Metals (ICP/MS)

Lab Sample ID: MB 620-50010/1-A

Matrix: Water

Analyte Copper Zinc

Zinc

Zinc

Matrix: Water

Analysis Batch: 50201

						Prep Batch:	. 50010
MB	MB					•	
Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
ND		4.00	ug/L		07/02/25 18:05	07/08/25 12:32	1
ND		16.0	ug/L		07/02/25 18:05	07/08/25 12:32	1

ug/L

ug/L

Lab Sample ID: LCS 620-50010/2-A **Client Sample ID: Lab Control Sample Matrix: Water** Prep Type: Total/NA **Analysis Batch: 50201** Prep Batch: 50010 Spike LCS LCS %Rec Added Analyte Result Qualifier Unit %Rec Limits Copper 50.0 49.76 ug/L 100 85 - 115

43.31

25.21

Lab Sample ID: 620-27304-1 MS Client Sample ID: CS-001 **Matrix: Water** Prep Type: Total/NA Prep Batch: 50010 **Analysis Batch: 50201** Sample Sample Spike MS MS %Rec Result Qualifier Added Result Qualifier D %Rec Limits Analyte Unit

Copper ND 50.0 49.72 ug/L 99 70 - 130 Zinc 22 4 50.0 83 05 121 70 - 130ug/L

50.0

Lab Sample ID: 620-27304-1 DU Client Sample ID: CS-001 **Matrix: Water** Prep Type: Total/NA **Analysis Batch: 50201** Prep Batch: 50010 DU DU **RPD** Sample Sample Analyte Result Qualifier Result Qualifier Unit D RPD Limit Copper ND ND ug/L NC 20

Method: 1664B - HEM and SGT-HEM

22.4

Lab Sample ID: MB 620-50184/1-A **Client Sample ID: Method Blank Matrix: Water** Prep Type: Total/NA **Analysis Batch: 50210** Prep Batch: 50184

MB MB Analyte Result Qualifier RL Unit Prepared Analyzed Dil Fac

Oil & Grease $\overline{\mathsf{ND}}$ 2.0 mq/L 07/08/25 10:45 07/08/25 16:17 Lab Sample ID: LCS 620-50184/2-A **Client Sample ID: Lab Control Sample**

Analysis Batch: 50210 Prep Batch: 50184 Spike LCS LCS %Rec Added Result Qualifier Unit %Rec Limits

Analyte Oil & Grease 40.0 33.50 mg/L 78 - 114

Lab Sample ID: LCSD 620-50184/3-A Client Sample ID: Lab Control Sample Dup **Matrix: Water** Prep Type: Total/NA **Analysis Batch: 50210** Prep Batch: 50184 Spike LCSD LCSD %Rec **RPD** Added Result Qualifier %Rec Limit Analyte Unit Limits **RPD** Oil & Grease 40.0 30.70 *-77 78 - 114 mg/L

Eurofins Rhode Island

7/10/2025

Prep Type: Total/NA

Page 12 of 24

Client Sample ID: Method Blank

87

85 - 115

Prep Type: Total/NA

12

Client: Roux Associates Inc Job ID: 620-27304-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Method: 180.1 - Turbidity, Nephelometric

Lab Sample ID: MB 620-50085/8

Analysis Batch: 50085

Matrix: Water

MB MB

Result Qualifier RL Unit Analyzed Dil Fac Analyte D Prepared 0.30 NTU 07/03/25 13:02 Turbidity ND

Lab Sample ID: LCS 620-50085/9

Matrix: Water

Analysis Batch: 50085

Spike LCS LCS %Rec Analyte Added Result Qualifier Unit D %Rec Limits 100 100 NTU 90 - 110 Turbidity 99

Lab Sample ID: 620-27304-1 DU

Matrix: Water

Analysis Batch: 50085

Sample Sample DU DU RPD RPD Analyte Result Qualifier Result Qualifier Limit Unit Turbidity 0.40 0.40 NTU 20

RL

10.0

Unit

mg/L

Unit

mg/L

LCS LCS

74.16

Result Qualifier

Method: 410.4 - COD

Lab Sample ID: MB 620-50314/3-A

Matrix: Water

Analysis Batch: 50355

MB MB

Analyte Result Qualifier

Chemical Oxygen Demand $\overline{\mathsf{ND}}$

Lab Sample ID: LCS 620-50314/4-A

Matrix: Water

Analysis Batch: 50355

Analyte Chemical Oxygen Demand

Method: EPA 350.1 - Nitrogen, Ammonia

Lab Sample ID: MB 410-668186/109

Matrix: Water

Analysis Batch: 668186

MB MB

Result Qualifier RL Unit Prepared Analyzed Ammonia as N $\overline{\mathsf{ND}}$ 0.100 mg/L 07/07/25 13:30

Spike

Added

75.0

Lab Sample ID: LCS 410-668186/107

Matrix: Water

Analysis Batch: 668186

LCS LCS Spike %Rec Added Limits Analyte Result Qualifier Unit %Rec 2 00 2.150 Ammonia as N mg/L 107 90 - 110

Eurofins Rhode Island

7/10/2025

Client Sample ID: Lab Control Sample Prep Type: Total/NA

Dil Fac

Prep Batch: 50314 %Rec

Limits

Client Sample ID: Method Blank

Client Sample ID: Method Blank

Analyzed

Prepared

%Rec

Client Sample ID: Method Blank

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Prep Type: Total/NA

Client Sample ID: CS-001

Prep Type: Total/NA

Prep Type: Total/NA

Prep Batch: 50314

90 - 110

07/10/25 09:31 07/10/25 16:08

Dil Fac

Prep Type: Total/NA

Client: Roux Associates Inc Job ID: 620-27304-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Method: EPA 350.1 - Nitrogen, Ammonia (Continued)

Lab Sample ID: LCSD 410-668186/108 Client Sample ID: Lab Control Sample Dup

Matrix: Water

Analysis Batch: 668186

LCSD LCSD RPD Spike %Rec Result Qualifier Analyte Added Unit D %Rec Limits RPD Limit Ammonia as N 2.00 2.055 mg/L 103 90 - 110 5 15

Method: SM 2540D - Solids, Total Suspended (TSS)

Lab Sample ID: MB 620-50070/1 Client Sample ID: Method Blank Prep Type: Total/NA

Matrix: Water

Analysis Batch: 50070

MB MB Result Qualifier RL Unit **Prepared** Analyzed Dil Fac 5.00 07/03/25 16:20 Total Suspended Solids ND mg/L

Lab Sample ID: LCS 620-50070/2 **Client Sample ID: Lab Control Sample Matrix: Water** Prep Type: Total/NA

Analysis Batch: 50070

Spike LCS LCS %Rec Added Result Qualifier Limits **Analyte** Unit %Rec **Total Suspended Solids** 100 84.00 mg/L 84 77 - 110

Eurofins Rhode Island

7/10/2025

Prep Type: Total/NA

QC Association Summary

Client: Roux Associates Inc Job ID: 620-27304-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

GC/MS VOA

Analysis Batch: 50028

Lab Sample ID 620-27304-1	Client Sample ID CS-001	Prep Type Total/NA	Matrix Water	Method 624.1	Prep Batch
620-27304-2	Aquip-INF	Total/NA	Water	624.1	
MB 620-50028/7	Method Blank	Total/NA	Water	624.1	
LCS 620-50028/4	Lab Control Sample	Total/NA	Water	624.1	
LCSD 620-50028/5	Lab Control Sample Dup	Total/NA	Water	624.1	

GC/MS Semi VOA

Prep Batch: 50071

Lab Sample ID 620-27304-1	Client Sample ID CS-001	Prep Type Total/NA	Matrix Water	Method 625	Prep Batch
620-27304-2	Aquip-INF	Total/NA	Water	625	
MB 620-50071/1-A	Method Blank	Total/NA	Water	625	
LCS 620-50071/4-A	Lab Control Sample	Total/NA	Water	625	
LCSD 620-50071/5-A	Lab Control Sample Dup	Total/NA	Water	625	

Analysis Batch: 50125

Lab Sample ID MB 620-50071/1-A	Client Sample ID Method Blank	Prep Type Total/NA	Matrix Water	Method 625.1 SIM	Prep Batch 50071
LCS 620-50071/4-A	Lab Control Sample	Total/NA	Water	625.1 SIM	50071
LCSD 620-50071/5-A	Lab Control Sample Dup	Total/NA	Water	625.1 SIM	50071

Analysis Batch: 50193

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-27304-1	CS-001	Total/NA	Water	625.1 SIM	50071
620-27304-2	Aquip-INF	Total/NA	Water	625.1 SIM	50071

Metals

Prep Batch: 50010

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-27304-1	CS-001	Total/NA	Water	200.8	
620-27304-2	Aquip-INF	Total/NA	Water	200.8	
MB 620-50010/1-A	Method Blank	Total/NA	Water	200.8	
LCS 620-50010/2-A	Lab Control Sample	Total/NA	Water	200.8	
620-27304-1 MS	CS-001	Total/NA	Water	200.8	
620-27304-1 DU	CS-001	Total/NA	Water	200.8	

Analysis Batch: 50201

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-27304-1	CS-001	Total/NA	Water	200.8	50010
620-27304-2	Aquip-INF	Total/NA	Water	200.8	50010
MB 620-50010/1-A	Method Blank	Total/NA	Water	200.8	50010
LCS 620-50010/2-A	Lab Control Sample	Total/NA	Water	200.8	50010
620-27304-1 MS	CS-001	Total/NA	Water	200.8	50010
620-27304-1 DU	CS-001	Total/NA	Water	200.8	50010

General Chemistry

Analysis Batch: 50070

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-27304-1	CS-001	Total/NA	Water	SM 2540D	

Eurofins Rhode Island

7/10/2025

Page 15 of 24

3

4

6

9

11

40

14

4 -

QC Association Summary

Client: Roux Associates Inc Job ID: 620-27304-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

General Chemistry (Continued)

Analys	is Batch	50070	(Continued)
Allalys	ns Daltii.	30070	Continueu

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method Prep Batcl	h
620-27304-2	Aquip-INF	Total/NA	Water	SM 2540D	_
MB 620-50070/1	Method Blank	Total/NA	Water	SM 2540D	
LCS 620-50070/2	Lab Control Sample	Total/NA	Water	SM 2540D	

Analysis Batch: 50085

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-27304-1	CS-001	Total/NA	Water	180.1	
MB 620-50085/8	Method Blank	Total/NA	Water	180.1	
LCS 620-50085/9	Lab Control Sample	Total/NA	Water	180.1	
620-27304-1 DU	CS-001	Total/NA	Water	180.1	

Prep Batch: 50184

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-27304-1	CS-001	Total/NA	Water	1664B	<u> </u>
MB 620-50184/1-A	Method Blank	Total/NA	Water	1664B	
LCS 620-50184/2-A	Lab Control Sample	Total/NA	Water	1664B	
LCSD 620-50184/3-A	Lab Control Sample Dup	Total/NA	Water	1664B	

Analysis Batch: 50210

Lab Sample ID 620-27304-1	Client Sample ID CS-001	Prep Type Total/NA	Matrix Water	Method 1664B	Prep Batch 50184
MB 620-50184/1-A	Method Blank	Total/NA	Water	1664B	50184
LCS 620-50184/2-A	Lab Control Sample	Total/NA	Water	1664B	50184
LCSD 620-50184/3-A	Lab Control Sample Dup	Total/NA	Water	1664B	50184

Prep Batch: 50314

Lab Sample ID 620-27304-1	Client Sample ID	Prep Type Total/NA	Matrix Water	Method 410.4	Prep Batch
MB 620-50314/3-A	Method Blank	Total/NA	Water	410.4	
LCS 620-50314/4-A	Lab Control Sample	Total/NA	Water	410.4	

Analysis Batch: 50355

Lab Sample ID 620-27304-1	Client Sample ID	Prep Type Total/NA	Matrix Water	Method 410.4	Prep Batch 50314
MB 620-50314/3-A	Method Blank	Total/NA	Water	410.4	50314
LCS 620-50314/4-A	Lab Control Sample	Total/NA	Water	410.4	50314

Analysis Batch: 668186

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-27304-1	CS-001	Total/NA	Water	EPA 350.1	
620-27304-2	Aquip-INF	Total/NA	Water	EPA 350.1	
MB 410-668186/109	Method Blank	Total/NA	Water	EPA 350.1	
LCS 410-668186/107	Lab Control Sample	Total/NA	Water	EPA 350.1	
LCSD 410-668186/108	Lab Control Sample Dup	Total/NA	Water	EPA 350.1	

Page 16 of 24

Lab Chronicle

Client: Roux Associates Inc Job ID: 620-27304-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Client Sample ID: CS-001

Date Collected: 07/02/25 09:00 Date Received: 07/02/25 16:30 Lab Sample ID: 620-27304-1

Matrix: Water

	Batch	Batch		Dilution	Batch			Prepared
Prep Type	Type	Method	Run	Factor	Number	Analyst	Lab	or Analyzed
Total/NA	Analysis	624.1			50028	CLR	EET RI	07/03/25 17:33
Total/NA	Prep	625			50071	AAH	EET RI	07/03/25 17:08
Total/NA	Analysis	625.1 SIM		1	50193	JS	EET RI	07/09/25 01:14
Total/NA	Prep	200.8			50010	JPC	EET RI	07/02/25 18:05
Total/NA	Analysis	200.8		1	50201	JPC	EET RI	07/08/25 12:37
Total/NA	Prep	1664B			50184	BJJ	EET RI	07/08/25 10:45
Total/NA	Analysis	1664B		1	50210	AZD	EET RI	07/08/25 16:17
Total/NA	Analysis	180.1		1	50085	JPC	EET RI	07/03/25 13:02
Total/NA	Prep	410.4			50314	DJW	EET RI	07/10/25 09:31
Total/NA	Analysis	410.4		1	50355	DJW	EET RI	07/10/25 16:08
Total/NA	Analysis	EPA 350.1		1	668186	JCG7	ELLE	07/07/25 14:16
Total/NA	Analysis	SM 2540D		1	50070	DJW	EET RI	07/03/25 16:20

Client Sample ID: Aquip-INF

Date Collected: 07/02/25 09:10 Date Received: 07/02/25 16:30

Lab Sample ID: 620-27304-2

Matrix: Water

	Batch	Batch		Dilution	Batch			Prepared
Prep Type	Type	Method	Run	Factor	Number	Analyst	Lab	or Analyzed
Total/NA	Analysis	624.1			50028	CLR	EET RI	07/03/25 17:56
Total/NA	Prep	625			50071	AAH	EET RI	07/03/25 17:08
Total/NA	Analysis	625.1 SIM		1	50193	JS	EET RI	07/09/25 01:43
Total/NA	Prep	200.8			50010	JPC	EET RI	07/02/25 18:05
Total/NA	Analysis	200.8		1	50201	JPC	EET RI	07/08/25 12:45
Total/NA	Analysis	EPA 350.1		1	668186	JCG7	ELLE	07/07/25 14:18
Total/NA	Analysis	SM 2540D		1	50070	DJW	EET RI	07/03/25 16:20

Laboratory References:

EET RI = Eurofins Rhode Island, 646 Camp Ave, North Kingstown, RI 02852, TEL (413)789-9018

ELLE = Eurofins Lancaster Laboratories Environment Testing, LLC, 2425 New Holland Pike, Lancaster, PA 17601, TEL (717)656-2300

Accreditation/Certification Summary

Client: Roux Associates Inc Job ID: 620-27304-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Laboratory: Eurofins Rhode Island

Unless otherwise noted, all analytes for this laboratory were covered under each accreditation/certification below.

thority	Prog	ram	Identification Number	Expiration Date
ssachusetts	State		M-RI907	06-30-26
The following analyte	s are included in this rep	ort, but the laboratory is i	not certified by the governing authori	ty. This list may include analytes
for which the agency	does not offer certificatio	n.		
Analysis Method	Prep Method	Matrix	Analyte	
180.1		Water	Turbidity	
625.1 SIM	625	Water	Benzo[a]anthracene	
625.1 SIM	625	Water	Benzo[a]pyrene	
625.1 SIM	625	Water	Benzo[b]fluoranthene	
625.1 SIM	625	Water	Benzo[k]fluoranthene	
625.1 SIM	625	Water	Chrysene	
625.1 SIM	625	Water	Dibenz(a,h)anthracene	
625.1 SIM	625	Water	Indeno[1,2,3-cd]pyrene	
625.1 SIM	625	Water	Naphthalene	

Laboratory: Eurofins Lancaster Laboratories Environment Testing, LLC

The accreditations/certifications listed below are applicable to this report.

Authority	Program	Identification Number	Expiration Date
Massachusetts	State	M-PA009	06-30-26

Method Summary

Client: Roux Associates Inc Job ID: 620-27304-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Method	Method Description	Protocol	Laboratory
624.1	Volatile Organic Compounds (GC/MS)	EPA	EET RI
625.1 SIM	Semivolatile Organic Compounds GC/MS (SIM)	EPA	EET RI
200.8	Metals (ICP/MS)	EPA	EET RI
1664B	HEM and SGT-HEM	1664B	EET RI
180.1	Turbidity, Nephelometric	EPA	EET RI
110.4	COD	EPA	EET RI
EPA 350.1	Nitrogen, Ammonia	EPA	ELLE
SM 2540D	Solids, Total Suspended (TSS)	SM	EET RI
1664B	HEM and SGT-HEM (Aqueous)	1664B	EET RI
200.8	Preparation, Total Metals	EPA	EET RI
110.4	COD	EPA	EET RI
625	Liquid-Liquid Extraction	EPA	EET RI

Protocol References:

1664B = EPA-821-98-002

EPA = US Environmental Protection Agency

SM = "Standard Methods For The Examination Of Water And Wastewater"

Laboratory References:

EET RI = Eurofins Rhode Island, 646 Camp Ave, North Kingstown, RI 02852, TEL (413)789-9018

ELLE = Eurofins Lancaster Laboratories Environment Testing, LLC, 2425 New Holland Pike, Lancaster, PA 17601, TEL (717)656-2300

Sample Summary

Client: Roux Associates Inc Job ID: 620-27304-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
620-27304-1	CS-001	Water	07/02/25 09:00	07/02/25 16:30
620-27304-2	Aquip-INF	Water	07/02/25 09:10	07/02/25 16:30

3

Δ

0

8

9

10

12

13

14

eurofi	ns		CHAI	NΩ	F (7116	ЗΤ(JП	v	DГ	CC	JD I	n				_	_	TAT - 7 to		ess days
4, Curon		um Analytical	CIIAI			1_			1 .	ΚĽ)Kı	U					All TATs : Min. 24-h	Γ - Date Ne subject to lat r notification isposed after	boratory ap	
Report To Roux Associ	ates		Invoice To	Roux										Projec	t No		1629 0	009M002			
200 Summit Burlington , I	Drive, Suite 500										-			Site N	ame.		Cheise	a Sandwich	n, LLC - Mo	nthly Apri	ıl to October
Bullington , i	WIA 0 1003			e-mail ır	ivoice t	o rouxa	арштои	uxinc.c	com					Locat	ion		11 Bro	adway, Che	elsea		State MA
)-569-4000 Henderson		P O No	1629	0009M	002_	Quo	ote#_						Samp					K.6	AUDE	
F=Field Filtered 1= 7=CH3OH 8=NaHSO	Na ₂ S2O ₃ 2=HCl O ₄ 9=Deionized Water		5=NaOH (6=Ascorbi										List P	reserva	ative C	ode belo	ow:			QA/QC Reporting Notes:
										-	<u> </u>	3	3	2	<u> </u>	4	3	-	<u>-</u>		* additional charges may appply
DW=Drinking Water	GW=Groundwater	SW=Surface Water V	VW=Waste Wat	er	_		Contair	ners			 	T	T	т	A	nalysis	T	The state of the s			MA DEP MCP CAM Report? Yes N CT DPH RCP Report? Yes N
X1=	X2=	oor/Ambient Air SG=S = X3	=			4 Vials	of Amber Glass	ır Glass	tic	(Q0	Turbidity (180.1)	Chemical Oxygen Demand	Oil & Grease (1664B)	(624.1)	Target PAHs (625.1 SIM)*	Total Cu, Zn (200.8)	ia as N (360.1)		ی		Standard No QC DQA* ASP A* ASP B* NJ Reduced* NJ Full* Tier II* Tier IV* Other Standards S
G= G	Sample ID:	C=Comps:	te Time:	Type	Матпх	# of VOA	of Am	of Clear	of Plastic	TSS (2540D)	urbidit	hemical C	ll & Gr	Benzene (624.1)	arget P	otal Cu	Ammonia	Field pH	Field TRC		Tier II* Tier IV*
	CS-001	7225	900	G	ww	3	3	0	4	X	X	X	×	X	X	X	X	67	0.0		State-specific reporting standards CS-001 PAHs and Minimum Levels (CRLs) required
-2	Aquip-INF	7.2 25	910	G	ww	3	2	0	3	х				x	х	x	х		001		benzo(a)anthracene benzo(b)fluoranthene and indeno(1 2,3-od)pyrene. 0 05 µg/L, benzo(a)pyrene and dibenzo(a h)anthracene 0 00013 µg/L,
<u> </u>							+														benzo(k)fluoranthene 0 013 µg/L, naphthalene 5 µg/L, and crysene 0 13 µg/L
																†					Aquip INF PAHs and Minimum Levels (CRLs)
																 					benzo(a)anthracene benzo(b)fluoranthene and indeno(1 2,3-cd)pyrene 0 05 µg/L, benzo(a)pyrene and dibenzo(a h)anthracene
																ť.	30	÷ _			0 00013 μg/L, benzo(k)fluoranthene 0 013 ug/L, and crysene 0 13 μg/L
							-							ļ	-	E	ŢΠ	-			그
				1		-	-						-		_	U		.			그
	•			+									-	ļ	+ "	620-2	7304 C	ос —			_
1 Rollinguis	hęd by:	Receive	ed by:		<u>1</u>	Date:		Tin	ne:	1	l Cemp °	C .	D	EDD	format:	1	EQUIS	EZEDD			
KI Day	h	7 7			72	.25		102	J	Ohscroed	. 4	the Andrews Street	1	E-ma			thender	son@rouxin	c.com, sbarr	nentos@ro	ouxinc.com
		akn 7	25		7/2	1/25	<u>, ,</u> S /		30	Corecction	n Factor						ireed@	rouxine cor	m		
		0, , ,			ι-,	/				Corrected	6		Condi	ition u	oon rec	eipt:	MA A Server A Control of Server Serve	one-authorities officeigness			☐ Present ☐ Intact ☐ Broken
				1						IR ID#		14 40-10		mbien	١.	- Leed			Refrigerate	đ	☐ DI VOA Frozen ☐ Soil Jar Froze

Page 21 of 24











Special Handling:

646 Camp Ava	
North Kingstown,	RI 02852

Chain of Custody Record



eurofins:	
-----------	--

Eurofins Lancaster Laboratories Environm State - Massachusetts Address: Due Date Requested:	Untitey@et.eurofinsus.com dditations Required (See note): le - Massachusetts Analysis X X X		(Total Number of containers	N/A	s:
Client Information (Sub Contract Lab) N/A Client Contact Phone: Phone: Phone: Phone: Agnes Huntley@et eurofins Agnes Huntley@et eurofins Company: Eurofins Lancaster Laboratories Environm City Lancaster City Lancaster City Lancaster Lancaster Lancaster N/A TAT Requested (days): Lancaster N/A TAT Requested (days): Lancaster N/A N/A Project Name: Project Name: Chelsea Sandwich, LLC - Chelsea, MA Site N/A Sample Identification - Client ID (Lab ID) Sample Identification - Client ID (Lab ID) Sample Identification - Client ID (Lab ID) T1/2/25 Sample Og Water Proservation Code Reservation Code CS-001 (620-27304-2) T2/25 T3/2/25 TAT Requested: TAT Requested (days): Sample CG-comp, (G-comp, GG-grab) (G-comp,	Untitey@et.eurofinsus.com dditations Required (See note): le - Massachusetts Analysis X X X	N/A State of Origin: Massachusetts	ber of containers	620-22325.1 Page: Page 1 of 1 Job #: 620-27304-1 Preservation Code	s:
Sample Identification - Client ID (Lab ID) Sample Date Sample Identification - Client ID (Lab ID) Sample Date Identification - Client ID (Lab ID) Sample Date Identification - Client ID (Lab ID) T/IZ/25 G9 / 40 G9 G9 G9 G9 G9 / 40 G9 G9 G9 G9 G9 G9 G9 G	Analysis Analysis X X X X X X	n Massachusetts	per of	Page 1 of 1 Job# 620-27304-1 Preservation Code	s:
Accreditations Required (Section State - Massachusetts	Analysis Analysis X X X X X X		per of	Job#: 620-27304-1 Preservation Code	s:
State - Massachusetts ddress:	Analysis Analysis X X X X X X X X X X X X X		per of	620-27304-1 Preservation Code Other:	s:
Due Date Requested:	X 350.1Ntrogen, Ammonia	ysis Requested	per of	Preservation Code Other: N/A	s:
1/2 1/2	X 350.1Nitrogen, Ammonia	ysis Requested	per of	Other: N/A	道:
TAT Requested (days): TAT Requested (days): N/A	X 350.1Nitrogen, Ammonia	ysis requested	per of	N/A	
N/A	X		per of	N/A	
Topic Topi	X		per of	N/A	
A, 17601 A 17601 A 17601 A 17605-2300(Tel)	X		per of	N/A	
PO #: N/A N/	X		per of	N/A	
N/A N/A N/A Sample C=comp, G=grab) RT-Sianos, AAAP RT-Sianos	X		per of	N/A	
mail: (A N/A N/A Project #: 62000149 SSOW#: N/A Sample Type G=grab) Sample Date Sample Time G=grab) S-001 (620-27304-1) T/2/25 Solution Freservation Code Water X Solution Freservation Code Water X Substitution Freservation Code A Water X Substitution Freservation Code Water X Substitution Freservation Code A Water X Substitution Freservation Code Water X Substitution Freservation Code Water X Substitution Freservation Code A Water X Substitution Freservation Code Water X Substitution Freservation Frese	X		per of	N/A	
S-001 (620-27304-1) 7/2/25 99:00 Eastern Water X Quip-INF (620-27304-2) 7/2/25 99:10 G Water X	X		per of	N/A	
S-001 (620-27304-1) 7/2/25 99:00 Eastern Water X Preservation Code: X Water X Pulp-INF (620-27304-2) 7/2/25 99:10 G Water X	X		per of	N/A	
S-001 (620-27304-1) 7/2/25 99:00 Eastern Water X Preservation Code: X Water X Pulp-INF (620-27304-2) 7/2/25 99:10 G Water X	X		per of	N/A	
S-001 (620-27304-1) 7/2/25 9:00 Eastern 7/2/25 9:10 G Water X Preservation Code: X Duito-INF (620-27304-2) 7/2/25 9:10 G Water X	X		per of	N/A	
S-001 (620-27304-1) 7/2/25 9:00 Eastern 7/2/25 9:10 G Water X Preservation Code: X Duito-INF (620-27304-2) 7/2/25 9:10 G Water X	X		per of	N/A	
S-001 (620-27304-1) 7/2/25	X		per		
S-001 (620-27304-1) 7/2/25 99:00 Eastern Water X 99:10 G Water X 99:10 G Water X	X		TotaliNumb		
S-001 (620-27304-1) 7/2/25 99:00 Eastern Water X CHURCH (620-27304-2) 7/2/25 99:10 G Water X	X		TotaliNu		
S-001 (620-27304-1) 7/2/25 99:00 Eastern Water X CHURCH (620-27304-2) 7/2/25 99:10 G Water X	X		Total		
S-001 (620-27304-1) 7/2/25 99:00 Eastern Water X Preservation Code: X Water X Pulp-INF (620-27304-2) 7/2/25 99:10 G Water X	X				
S-001 (620-27304-1) 7/2/25 09:00 G Water X Curio-INF (620-27304-2) 7/2/25 09:10 G Water X	x		d consists making a	Special ins	tructions/Note:
S-001 (620-27304-1)					
1/2/25 D9:10 G Water X			1		
1010+(NF (D2U-27-304-2) 1/2/25 1 5 VVAIRE X	X		30°	2	
			1	**	
			219,0	8	
		+	188	8	
			370.0	76	
				ed .	
			60	3	
			100	B	
		+++++			
			NAC.		

Login Sample Receipt Checklist

Client: Roux Associates Inc Job Number: 620-27304-1

Login Number: 27304 List Source: Eurofins Rhode Island

List Number: 1

Creator: Scott, Krishnan F

Question	Answer	Comment
Radioactivity wasn't checked or is = background as measured by a survey meter.</td <td>N/A</td> <td></td>	N/A	
The cooler's custody seal, if present, is intact.	N/A	
Sample custody seals, if present, are intact.	N/A	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time (excluding tests with immediate HTs)	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	True	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is <6mm (1/4").	True	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	
Residual Chlorine Checked.	N/A	

Eurofins Rhode Island

7/10/2025

6

8

9

11

. .

Login Sample Receipt Checklist

Client: Roux Associates Inc Job Number: 620-27304-1

Login Number: 27304 List Source: Eurofins Lancaster Laboratories Environment Testing, LLC List Number: 2 List Creation: 07/03/25 08:16 AM

Creator: Arroyo, Haley

Question	Answer	Comment
The cooler's custody seal is intact.	N/A	Not present
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature acceptable, where thermal pres is required (=6C, not frozen).</td <td>True</td> <td></td>	True	
Cooler Temperature is recorded.	True	
WV:Container Temp acceptable, where thermal pres is required (=6C, not frozen).</td <td>N/A</td> <td></td>	N/A	
WV: Container Temperature is recorded.	N/A	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
There are no discrepancies between the containers received and the COC.	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
There is sufficient vol. for all requested analyses.	True	
Is the Field Sampler's name present on COC?	False	Received project as a subcontract.
Sample custody seals are intact.	N/A	Not present.
VOA sample vials do not have headspace >6mm in diameter (none, if from WV)?	N/A	

12

EXHIBIT R

Environment Testing

ANALYTICAL REPORT

PREPARED FOR

Attn: Tom Henderson Roux Associates Inc 200 Summit Drive Suite 500 Burlington, Massachusetts 01803

Generated 8/7/2025 5:52:52 PM

JOB DESCRIPTION

Chelsea Sandwich, LLC - Chelsea, MA

JOB NUMBER

620-28231-1

Eurofins Rhode Island 646 Camp Ave North Kingstown RI 02852



Eurofins Rhode Island

Job Notes

This report may not be reproduced except in full, and with written approval from the laboratory. The results relate only to the samples tested. For questions please contact the Project Manager at the e-mail address or telephone number listed on this page.

The test results in this report relate only to the samples as received by the laboratory and will meet all requirements of the methodology, with any exceptions noted. This report shall not be reproduced except in full, without the express written approval of the laboratory. All questions should be directed to the Eurofins Environment Testing Northeast, LLC Project Manager.

Authorization

Generated 8/7/2025 5:52:52 PM

Authorized for release by Agnes Huntley, Project Manager Agnes.Huntley@et.eurofinsus.com (401)267-4374

Page 2 of 26 8/7/2025

3

4

5

0

0

q

10

4.0

13

14

Client: Roux Associates Inc Laboratory Job ID: 620-28231-1 Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Table of Contents

Cover Page	1
Table of Contents	3
Definitions/Glossary	4
Case Narrative	5
Detection Summary	6
Client Sample Results	7
Surrogate Summary	10
QC Sample Results	11
QC Association Summary	17
Lab Chronicle	19
Certification Summary	20
Method Summary	21
Sample Summary	22
Chain of Custody	23
Receipt Checklists	25

Definitions/Glossary

Client: Roux Associates Inc Job ID: 620-28231-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Qualifiers

GC/MS Semi VOA

Qualifier Qualifier Description

*+ LCS and/or LCSD is outside acceptance limits, high biased.

S1- Surrogate recovery exceeds control limits, low biased.

Glossary

Abbreviation These commonly used abbreviations may or may not be present in this report.

Listed under the "D" column to designate that the result is reported on a dry weight basis

%R Percent Recovery
CFL Contains Free Liquid
CFU Colony Forming Unit
CNF Contains No Free Liquid

DER Duplicate Error Ratio (normalized absolute difference)

Dil Fac Dilution Factor

DL Detection Limit (DoD/DOE)

DL, RA, RE, IN Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample

DLC Decision Level Concentration (Radiochemistry)

EDL Estimated Detection Limit (Dioxin)

LOD Limit of Detection (DoD/DOE)

LOQ Limit of Quantitation (DoD/DOE)

MCL EPA recommended "Maximum Contaminant Level"

MDA Minimum Detectable Activity (Radiochemistry)

MDC Minimum Detectable Concentration (Radiochemistry)

MDL Method Detection Limit
ML Minimum Level (Dioxin)
MPN Most Probable Number
MQL Method Quantitation Limit

NC Not Calculated

ND Not Detected at the reporting limit (or MDL or EDL if shown)

NEG Negative / Absent POS Positive / Present

PQL Practical Quantitation Limit

PRES Presumptive QC Quality Control

RER Relative Error Ratio (Radiochemistry)

RL Reporting Limit or Requested Limit (Radiochemistry)

RPD Relative Percent Difference, a measure of the relative difference between two points

TEF Toxicity Equivalent Factor (Dioxin)
TEQ Toxicity Equivalent Quotient (Dioxin)

TNTC Too Numerous To Count

Eurofins Rhode Island

Page 4 of 26 8/7/2025

Case Narrative

Client: Roux Associates Inc Job ID: 620-28231-1

Project: Chelsea Sandwich, LLC - Chelsea, MA

Job ID: 620-28231-1 Eurofins Rhode Island

Job Narrative 620-28231-1

The analytical test results presented in this report meet all requirements of the associated regulatory program listed on the Accreditation/Certification Summary Page, unless otherwise noted. Data qualifiers and/or narrative comments are included to explain any exceptions, if applicable. Regulated compliance samples (e.g. SDWA, NPDES) must comply with associated agency requirements/permits.

- Matrix-specific batch QC (e.g., MS, MSD, SD) may not be reported when insufficient sample volume is available or when site-specific QC samples are not submitted. In such cases, a Laboratory Control Sample Duplicate (LCSD) may be analyzed to provide precision data for the batch.
- For samples analyzed using surrogate and/or isotope dilution analytes, any recoveries falling outside of established acceptance criteria are re-prepared and/or re-analyzed to confirm results, unless the deviation is due to sample dilution or otherwise explained in the case narrative.

Receipt

The samples were received on 8/4/2025 3:40 PM. Unless otherwise noted below, the samples arrived in good condition, and, where required, properly preserved and on ice. The temperature of the cooler at receipt time was 3.6°C.

GC/MS VOA

Method 624.1_PREC: Insufficient sample volume was available to perform a matrix spike/matrix spike duplicate (MS/MSD) associated with analytical batch 620-51567.

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

GC/MS Semi VOA

Method 625.1_PREC: The laboratory control sample (LCS) for preparation batch 620-51601 and analytical batch 620-51557 recovered outside control limits (bias high) for the following analyte: Di-n-butyl phthalate. The affected target analyte recovered within acceptance limits in the laboratory control sample duplicate (LCSD). Per the 625.1 method, analysis may continue.

Method 625.1_PREC: Six surrogates are used for this analysis. The laboratory's SOP allows one acid and one base of these surrogates to be outside acceptance criteria without performing re-extraction/re-analysis. The following sample contained an allowable number of surrogate compounds outside limits: CS-001 (620-28231-2). These results have been reported and qualified.

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

Metals

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

General Chemistry

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

Eurofins Rhode Island

Detection Summary

Client: Roux Associates Inc Job ID: 620-28231-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Client Sample ID: Aquip-INF Lab Sample ID: 620-28231-1

Analyte	Result Qualifier	RL	Unit	Dil Fac) Method	Prep Type
Copper	5.94	4.00	ug/L		200.8	Total/NA
Zinc	27.1	16.0	ug/L	1	200.8	Total/NA
Ammonia as N	0.315	0.100	mg/L	1	EPA 350.1	Total/NA

Client Sample ID: CS-001 Lab Sample ID: 620-28231-2

Analyte	Result Qualifier	RL	Unit	Dil Fac [Method	Prep Type
Zinc	80.4	16.0	ug/L		200.8	Total/NA
Turbidity	1.9	0.30	NTU	1	180.1	Total/NA

Client Sample Results

Client: Roux Associates Inc Job ID: 620-28231-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Client Sample ID: Aquip-INF

Ammonia as N (EPA 350.1)

Total Suspended Solids (SM 2540D)

0.315

ND

Lab Sample ID: 620-28231-1 Date Collected: 08/04/25 09:50

Matrix: Water

Method: EPA 624.1 - Volatil	le Organic Con	npounds (GC/MS)					
Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Benzene	ND		1.00	ug/L			08/05/25 16:59	1
Surrogate	%Recovery	Qualifier	Limits			Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene (Surr)	96		70 - 130				08/05/25 16:59	1
Toluene-d8 (Surr)	102		70 - 130				08/05/25 16:59	1
1,2-Dichloroethane-d4 (Surr)	90		70 - 130				08/05/25 16:59	1
Dibromofluoromethane (Surr)	80		70 - 130				08/05/25 16:59	1
Method: EPA 625.1 SIM - S	emivolatile Ord	anic Com	pounds GC/MS	(SIM)				
Analyte		Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Benzo[a]anthracene	ND		0.0500	ug/L		08/05/25 12:58	08/05/25 18:30	1
Benzo[a]pyrene	ND		0.0500	ug/L		08/05/25 12:58	08/05/25 18:30	1
Benzo[b]fluoranthene	ND		0.0500	ug/L		08/05/25 12:58	08/05/25 18:30	1
Benzo[k]fluoranthene	ND		0.0500	ug/L		08/05/25 12:58	08/05/25 18:30	1
Chrysene	ND		0.0500	ug/L		08/05/25 12:58	08/05/25 18:30	1
Dibenz(a,h)anthracene	ND		0.0500	ug/L		08/05/25 12:58	08/05/25 18:30	1
Indeno[1,2,3-cd]pyrene	ND		0.0500	ug/L		08/05/25 12:58	08/05/25 18:30	1
Naphthalene	ND		0.0500	ug/L		08/05/25 12:58	08/05/25 18:30	1
Surrogate	%Recovery	Qualifier	Limits			Prepared	Analyzed	Dil Fac
2-Fluorobiphenyl (Surr)	35		30 - 130			08/05/25 12:58	08/05/25 18:30	1
Terphenyl-d14	55		30 - 130			08/05/25 12:58	08/05/25 18:30	1
Benzo(e)pyrene-d12	90		30 - 130			08/05/25 12:58	08/05/25 18:30	1
Method: EPA 200.8 - Metals	s (ICP/MS)							
Analyte	•	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Copper	5.94		4.00	ug/L		08/04/25 17:23	08/05/25 15:09	1
Zinc	27.1		16.0	ug/L		08/04/25 17:23	08/05/25 15:09	1
General Chemistry								
Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fa

0.100

10.0

mg/L

mg/L

08/06/25 11:07

08/05/25 08:36

Client Sample Results

Client: Roux Associates Inc Job ID: 620-28231-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Client Sample ID: CS-001 Lab Sample ID: 620-28231-2

Date Collected: 08/04/25 09:45 Matrix: Water

Date Received: 08/04/25 15:40	

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Benzene	MD		1.00	ug/L			08/05/25 17:27	1
Surrogate	%Recovery	Qualifier	Limits			Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene (Surr)	96		70 - 130				08/05/25 17:27	1
Toluene-d8 (Surr)	100		70 - 130				08/05/25 17:27	1
1,2-Dichloroethane-d4 (Surr)	84		70 - 130				08/05/25 17:27	1
Dibromofluoromethane (Surr)	82		70 - 130				08/05/25 17:27	1

١	Method: EPA 625.1	I SIM - Semivolatile	Organic Compo	unds GC/MS (SIM)
ı	mothod: El /t ozo:	on commonation	Organic Compo	

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Benzo[a]anthracene	ND ND		0.0463	ug/L		08/05/25 12:58	08/05/25 18:58	1
Benzo[a]pyrene	ND		0.0463	ug/L		08/05/25 12:58	08/05/25 18:58	1
Benzo[b]fluoranthene	ND		0.0463	ug/L		08/05/25 12:58	08/05/25 18:58	1
Benzo[k]fluoranthene	ND		0.0463	ug/L		08/05/25 12:58	08/05/25 18:58	1
Chrysene	ND		0.0463	ug/L		08/05/25 12:58	08/05/25 18:58	1
Dibenz(a,h)anthracene	ND		0.0463	ug/L		08/05/25 12:58	08/05/25 18:58	1
Indeno[1,2,3-cd]pyrene	ND		0.0463	ug/L		08/05/25 12:58	08/05/25 18:58	1
Naphthalene	ND		0.0463	ug/L		08/05/25 12:58	08/05/25 18:58	1
Surrogate	%Recovery	Qualifier	Limits			Prepared	Analyzed	Dil Fac
2-Fluorobiphenyl (Surr)	44		30 - 130			08/05/25 12:58	08/05/25 18:58	1
Terphenyl-d14	50		30 - 130			08/05/25 12:58	08/05/25 18:58	1

2-1 ladiosiphenyi (Gari)	77	30 - 130	00/03/23 12.30	00/03/23 10.30
Terphenyl-d14	50	30 - 130	08/05/25 12:58	08/05/25 18:58
Benzo(e)pyrene-d12	82	30 - 130	08/05/25 12:58	08/05/25 18:58

Method: EPA 625.1 -	Semivolatile Or	ganic Compounds	(GC/MS)
---------------------	-----------------	-----------------	---------

Analyte	Result Qualifier	RL	Unit	D Prepared	Analyzed	Dil Fac
Bis(2-ethylhexyl) phthalate	ND ND	9.26	ug/L	08/05/25 12:58	08/06/25 13:39	1
Butyl benzyl phthalate	ND	4.63	ug/L	08/05/25 12:58	08/06/25 13:39	1
Diethyl phthalate	ND	4.63	ug/L	08/05/25 12:58	08/06/25 13:39	1
Dimethyl phthalate	ND	4.63	ug/L	08/05/25 12:58	08/06/25 13:39	1
Di-n-butyl phthalate	ND *+	18.5	ug/L	08/05/25 12:58	08/06/25 13:39	1
Di-n-octyl phthalate	ND	4.63	ug/L	08/05/25 12:58	08/06/25 13:39	1

Surrogate	%Recovery (Qualifier	Limits	Prepared Analyzed	Dil Fac
2-Fluorobiphenyl (Surr)	56		30 - 130	08/05/25 12:58 08/06/25 13:39	1
2-Fluorophenol (Surr)	15		15 - 110	08/05/25 12:58 08/06/25 13:39	1
Nitrobenzene-d5 (Surr)	57		30 - 130	08/05/25 12:58 08/06/25 13:39	1
Phenol-d5 (Surr)	6 3	S1-	15 - 110	08/05/25 12:58 08/06/25 13:39	1
2,4,6-Tribromophenol (Surr)	50		15 - 110	08/05/25 12:58 08/06/25 13:39	1
Terphenyl-d14	57		30 - 130	08/05/25 12:58 08/06/25 13:39	1

Method: EPA 200.8 - Metals (ICP/MS)

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Copper	ND		4.00	ug/L		08/04/25 17:23	08/05/25 15:12	1
Zinc	80.4		16.0	ug/L		08/04/25 17:23	08/05/25 15:12	1

General Chemistry

Analyte	Result Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Oil & Grease (1664B)	ND	2.0	mg/L		08/05/25 12:28	08/05/25 14:48	1
Turbidity (EPA 180.1)	1.9	0.30	NTU			08/05/25 14:59	1

Eurofins Rhode Island

Page 8 of 26 8/7/2025

Client Sample Results

Client: Roux Associates Inc Job ID: 620-28231-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Client Sample ID: CS-001 Lab Sample ID: 620-28231-2

Date Collected: 08/04/25 09:45 Matrix: Water

Date Received: 08/04/25 15:40

General Chemistry (Continued)						
Analyte	Result Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Chemical Oxygen Demand (EPA 410.4)	ND	10.0	mg/L		08/05/25 10:26	08/06/25 10:58	1
Ammonia as N (EPA 350.1)	ND	0.100	mg/L			08/06/25 11:10	1
Total Suspended Solids (SM 2540D)	ND	5.00	mg/L			08/05/25 08:36	1

Surrogate Summary

Client: Roux Associates Inc Job ID: 620-28231-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Method: 624.1 - Volatile Organic Compounds (GC/MS)

Matrix: Water Prep Type: Total/NA

			Pe	ercent Surre	ogate Reco
		BFB	TOL	DCA	DBFM
Lab Sample ID	Client Sample ID	(70-130)	(70-130)	(70-130)	(70-130)
620-28231-1	Aquip-INF	96	102	90	80
620-28231-2	CS-001	96	100	84	82
LCS 620-51567/4	Lab Control Sample	101	102	101	102
LCSD 620-51567/5	Lab Control Sample Dup	102	101	95	99
MB 620-51567/7	Method Blank	99	99	104	105
Surrogate Legend					

BFB = 4-Bromofluorobenzene (Surr)

TOL = Toluene-d8 (Surr)

DCA = 1,2-Dichloroethane-d4 (Surr) DBFM = Dibromofluoromethane (Surr)

Method: 625.1 - Semivolatile Organic Compounds (GC/MS)

Matrix: Water Prep Type: Total/NA

_	Percent Surrogate Recovery (Acceptance Limits)							
		FBP	2FP	NBZ	PHL	TBP	TPHL	
Lab Sample ID	Client Sample ID	(30-130)	(15-110)	(30-130)	(15-110)	(15-110)	(30-130)	
620-28231-2	CS-001	56	15	57	6 S1-	50	57	
LCS 620-51601/2-A	Lab Control Sample	59	40	62	29	86	68	
LCSD 620-51601/3-A	Lab Control Sample Dup	45	32	46	24	68	59	
MB 620-51601/1-A	Method Blank	49	54	50	42	71	59	

Surrogate Legend

FBP = 2-Fluorobiphenyl (Surr)

2FP = 2-Fluorophenol (Surr)

NBZ = Nitrobenzene-d5 (Surr)

PHL = Phenol-d5 (Surr)

TBP = 2,4,6-Tribromophenol (Surr)

TPHL = Terphenyl-d14

Method: 625.1 SIM - Semivolatile Organic Compounds GC/MS (SIM)

Matrix: Water Prep Type: Total/NA

		ercent Surrogate Recovery (Acceptance Limits)					
		FBP	TPHL	BePd12			
Lab Sample ID	Client Sample ID	(30-130)	(30-130)	(30-130)			
620-28231-1	Aquip-INF	35	55	90			
620-28231-2	CS-001	44	50	82			
LCS 620-51601/4-A	Lab Control Sample	44	56	91			
MB 620-51601/1-A	Method Blank	39	55	81			

Surrogate Legend

FBP = 2-Fluorobiphenyl (Surr)

TPHL = Terphenyl-d14

BePd12 = Benzo(e)pyrene-d12

Eurofins Rhode Island

Page 10 of 26

Client: Roux Associates Inc Job ID: 620-28231-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Method: 624.1 - Volatile Organic Compounds (GC/MS)

Lab Sample ID: MB 620-51567/7 Client Sample ID: Method Blank **Matrix: Water** Prep Type: Total/NA

Analysis Batch: 51567

MB MB Analyte Result Qualifier RL Unit Analyzed Dil Fac D Prepared 08/05/25 11:39 Benzene ND 1.00 ug/L

MB MB Surrogate %Recovery Qualifier Limits Prepared Analyzed Dil Fac 4-Bromofluorobenzene (Surr) 99 70 - 130 08/05/25 11:39 Toluene-d8 (Surr) 99 70 - 130 08/05/25 11:39 1,2-Dichloroethane-d4 (Surr) 104 70 - 130 08/05/25 11:39 Dibromofluoromethane (Surr) 105 70 - 130 08/05/25 11:39

Lab Sample ID: LCS 620-51567/4 **Client Sample ID: Lab Control Sample Matrix: Water Prep Type: Total/NA**

Analysis Batch: 51567

	Spike	LCS	LCS				%Rec	
Analyte	Added	Result	Qualifier	Unit	D	%Rec	Limits	
Benzene	20.0	18.19		ug/L		91	65 - 135	

LCS LCS Surrogate %Recovery Qualifier Limits 4-Bromofluorobenzene (Surr) 70 - 130 101 Toluene-d8 (Surr) 102 70 - 130 1,2-Dichloroethane-d4 (Surr) 101 70 - 130 Dibromofluoromethane (Surr) 102 70 - 130

Lab Sample ID: LCSD 620-51567/5 Client Sample ID: Lab Control Sample Dup Prep Type: Total/NA

Matrix: Water

Analysis Batch: 51567

	Spike	LCSD	LCSD				%Rec		RPD
Analyte	Added	Result	Qualifier	Unit	D	%Rec	Limits	RPD	Limit
Benzene	 20.0	17.88		ua/L		89	65 - 135	2	

LCSD LCSD %Recovery Qualifier Limits Surrogate 70 - 130 4-Bromofluorobenzene (Surr) 102 Toluene-d8 (Surr) 101 70 - 130 70 - 130 1,2-Dichloroethane-d4 (Surr) 95 Dibromofluoromethane (Surr) 99 70 - 130

Method: 625.1 - Semivolatile Organic Compounds (GC/MS)

Lab Sample ID: MB 620-51601/1-A Client Sample ID: Method Blank **Matrix: Water Prep Type: Total/NA**

Analysis Batch: 51557

	MB	MR						
Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Bis(2-ethylhexyl) phthalate	ND		10.0	ug/L		08/05/25 12:58	08/05/25 17:41	1
Butyl benzyl phthalate	ND		5.00	ug/L		08/05/25 12:58	08/05/25 17:41	1
Diethyl phthalate	ND		5.00	ug/L		08/05/25 12:58	08/05/25 17:41	1
Dimethyl phthalate	ND		5.00	ug/L		08/05/25 12:58	08/05/25 17:41	1
Di-n-butyl phthalate	ND		20.0	ug/L		08/05/25 12:58	08/05/25 17:41	1
Di-n-octyl phthalate	ND		5.00	ug/L		08/05/25 12:58	08/05/25 17:41	1
•								

Eurofins Rhode Island

Page 11 of 26

Prep Batch: 51601

8/7/2025

Client: Roux Associates Inc Job ID: 620-28231-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Method: 625.1 - Semivolatile Organic Compounds (GC/MS) (Continued)

Lab Sample ID: MB 620-51601/1-A

Matrix: Water

Analysis Batch: 51557

Client Sample ID: Method Blank Prep Type: Total/NA

Prep Batch: 51601

MB MB %Recovery Qualifier Surrogate Limits Prepared Dil Fac Analyzed 2-Fluorobiphenyl (Surr) 49 30 - 130 08/05/25 12:58 08/05/25 17:41 2-Fluorophenol (Surr) 54 15 - 110 08/05/25 12:58 08/05/25 17:41 50 Nitrobenzene-d5 (Surr) 30 - 130 08/05/25 12:58 08/05/25 17:41 Phenol-d5 (Surr) 42 15 - 110 08/05/25 12:58 08/05/25 17:41 2,4,6-Tribromophenol (Surr) 71 15 - 110 Terphenyl-d14 59 30 - 130 08/05/25 12:58 08/05/25 17:41

Lab Sample ID: LCS 620-51601/2-A

Lab Sample ID: LCSD 620-51601/3-A

Matrix: Water

Matrix: Water

Analysis Batch: 51557

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Prep Batch: 51601

	Бріке	LCS	LCS				%Rec	
Analyte	Added	Result	Qualifier	Unit	D	%Rec	Limits	
Bis(2-ethylhexyl) phthalate	40.0	33.17		ug/L		83	8 - 158	
Butyl benzyl phthalate	40.0	33.78		ug/L		84	1 - 152	
Diethyl phthalate	40.0	30.50		ug/L		76	1 - 120	
Dimethyl phthalate	40.0	29.52		ug/L		74	1 - 120	
Di-n-butyl phthalate	40.0	51.93	*+	ug/L		130	1 - 120	
Di-n-octyl phthalate	40.0	29.30		ug/L		73	4 - 146	

Chile

LCS LCS

Surrogate	%Recovery	Qualifier	Limits
2-Fluorobiphenyl (Surr)	59		30 - 130
2-Fluorophenol (Surr)	40		15 - 110
Nitrobenzene-d5 (Surr)	62		30 - 130
Phenol-d5 (Surr)	29		15 - 110
2,4,6-Tribromophenol (Surr)	86		15 - 110
Terphenyl-d14	68		30 - 130

Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

Prep Batch: 51601

Analysis Batch: 51557 LCSD LCSD RPD Spike %Rec Analyte Added Result Qualifier Unit %Rec Limits RPD Limit Bis(2-ethylhexyl) phthalate 40.0 8 - 158 82 29.95 ug/L 75 10 ug/L Butyl benzyl phthalate 40.0 31.74 79 1 - 152 6 60 40.0 67 Diethyl phthalate 26.61 ug/L 1 - 120 100 14 Dimethyl phthalate 40.0 25.30 ug/L 63 1 - 120 183 Di-n-butyl phthalate 40.0 36.31 ug/L 91 1 - 120 35 47 40.0 Di-n-octyl phthalate 27.61 ug/L 69 4 - 146 6 69

LCSD LCSD

Surrogate	%Recovery	Qualifier	Limits
2-Fluorobiphenyl (Surr)	45	-	30 - 130
2-Fluorophenol (Surr)	32		15 - 110
Nitrobenzene-d5 (Surr)	46		30 - 130
Phenol-d5 (Surr)	24		15 - 110
2,4,6-Tribromophenol (Surr)	68		15 - 110
Terphenyl-d14	59		30 - 130

Eurofins Rhode Island

Page 12 of 26

Client: Roux Associates Inc Job ID: 620-28231-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Method: 625.1 SIM - Semivolatile Organic Compounds GC/MS (SIM)

Lab Sample ID: MB 620-51601/1-A

Matrix: Water

Analysis Batch: 51591

Client Sample ID: Method Blank

Prep Batch: 51601

Prep Type: Total/NA

	MB MB						
Analyte	Result Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Benzo[a]anthracene	ND ND	0.0500	ug/L		08/05/25 12:58	08/05/25 17:07	1
Benzo[a]pyrene	ND	0.0500	ug/L		08/05/25 12:58	08/05/25 17:07	1
Benzo[b]fluoranthene	ND	0.0500	ug/L		08/05/25 12:58	08/05/25 17:07	1
Benzo[k]fluoranthene	ND	0.0500	ug/L		08/05/25 12:58	08/05/25 17:07	1
Chrysene	ND	0.0500	ug/L		08/05/25 12:58	08/05/25 17:07	1
Dibenz(a,h)anthracene	ND	0.0500	ug/L		08/05/25 12:58	08/05/25 17:07	1
Indeno[1,2,3-cd]pyrene	ND	0.0500	ug/L		08/05/25 12:58	08/05/25 17:07	1
Naphthalene	ND	0.0500	ug/L		08/05/25 12:58	08/05/25 17:07	1

MB MB

Surrogate	%Recovery Qualifier	Limits	Prepared	Analyzed	Dil Fac
2-Fluorobiphenyl (Surr)	39	30 - 130	08/05/25 12:58	08/05/25 17:07	1
Terphenyl-d14	55	30 - 130	08/05/25 12:58	08/05/25 17:07	1
Benzo(e)pyrene-d12	81	30 - 130	08/05/25 12:58	08/05/25 17:07	1

Lab Sample ID: LCS 620-51601/4-A

Matrix: Water

Analysis Batch: 51591

Prep Type: Total/NA Prep Batch: 51601

	Spike	LCS	LCS				%Rec	
Analyte	Added	Result	Qualifier	Unit	D	%Rec	Limits	
Benzo[a]anthracene	4.00	3.747		ug/L		94	33 - 143	
Benzo[a]pyrene	4.00	3.653		ug/L		91	17 - 163	
Benzo[b]fluoranthene	4.00	2.862		ug/L		72	24 - 159	
Benzo[k]fluoranthene	4.00	3.280		ug/L		82	11 - 162	
Chrysene	4.00	3.148		ug/L		79	17 - 168	
Dibenz(a,h)anthracene	4.00	2.385		ug/L		60	10 - 227	
Indeno[1,2,3-cd]pyrene	4.00	2.815		ug/L		70	10 - 171	
Naphthalene	4.00	1.875		ug/L		47	21 - 133	

LCS LCS

Surrogate	%Recovery	Qualifier	Limits
2-Fluorobiphenyl (Surr)	44		30 - 130
Terphenyl-d14	56		30 - 130
Benzo(e)pyrene-d12	91		30 - 130

Method: 200.8 - Metals (ICP/MS)

Lab Sample ID: MB 620-51542/1-A

Matrix: Water

Analysis Batch: 51612

Client Sample ID: Method Blank
Prep Type: Total/NA
Prep Batch: 51542

Client Sample ID: Lab Control Sample

MB MB Analyte Result Qualifier RL Unit Prepared Analyzed Dil Fac 4.00 08/04/25 17:23 08/05/25 14:58 Copper ND ug/L 16.0 Zinc ND 08/04/25 17:23 08/05/25 14:58 ug/L

Page 13 of 26

Client: Roux Associates Inc Job ID: 620-28231-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Method: 200.8 - Metals (ICP/MS) (Continued)

Lab Sample ID: LCS 620-51542/2-A **Client Sample ID: Lab Control Sample**

Matrix: Water

Prep Type: Total/NA **Analysis Batch: 51612** Prep Batch: 51542

Spike LCS LCS %Rec Added Result Qualifier %Rec Limits Analyte Unit D Copper 50.0 44.07 ug/L 88 85 - 115 Zinc 50.0 36.20 ug/L 72 85 - 115

Method: 1664B - HEM and SGT-HEM

Lab Sample ID: MB 620-51596/1-A **Client Sample ID: Method Blank Matrix: Water Prep Type: Total/NA**

Analysis Batch: 51613

MB MB

Analyte Result Qualifier RL Unit Prepared Analyzed Dil Fac Oil & Grease 20 08/05/25 12:28 08/05/25 14:48 ND mg/L

Lab Sample ID: LCS 620-51596/2-A **Client Sample ID: Lab Control Sample Matrix: Water Prep Type: Total/NA Analysis Batch: 51613** Prep Batch: 51596

Spike LCS LCS %Rec

Analyte Added Result Qualifier Unit %Rec Limits Oil & Grease 40.0 32.60 mg/L 78 - 114

Lab Sample ID: LCSD 620-51596/3-A Client Sample ID: Lab Control Sample Dup Prep Type: Total/NA

Matrix: Water Analysis Batch: 51613

Prep Batch: 51596 LCSD LCSD %Rec **RPD** Spike

Added RPD Analyte Result Qualifier Unit %Rec Limits Limit 40.0 Oil & Grease 34.30 86 78 - 114 mg/L 5 11

Method: 180.1 - Turbidity, Nephelometric

Lab Sample ID: MB 620-51618/8 **Client Sample ID: Method Blank Prep Type: Total/NA**

Matrix: Water

Analysis Batch: 51618

Analyte Result Qualifier RL Unit Prepared Analyzed Dil Fac Turbidity ND 0.30 NTU 08/05/25 14:59

MB MB

Lab Sample ID: LCS 620-51618/9 **Client Sample ID: Lab Control Sample** Prep Type: Total/NA

Matrix: Water

Analysis Batch: 51618

Spike LCS LCS %Rec Analyte Added Result Qualifier Unit %Rec Limits D 102 100 NTU 90 - 110 Turbidity 100

Method: 410.4 - COD

Lab Sample ID: MB 620-51581/3-A Client Sample ID: Method Blank

Matrix: Water

Prep Type: Total/NA **Analysis Batch: 51670** Prep Batch: 51581

MB MB Analyte Result Qualifier RL Unit Prepared Analyzed Dil Fac

08/05/25 10:26 08/06/25 10:58 Chemical Oxygen Demand ND 10.0 mg/L

Eurofins Rhode Island

8/7/2025

Prep Batch: 51596

Client: Roux Associates Inc Job ID: 620-28231-1

Spike

Added

75.0

LCS LCS

MS MS

DU DU

LCS LCS

LCSD LCSD

Result Qualifier

1.934

2.018

Result Qualifier

ND

RL

0.100

Spike

Added

2.00

Spike

Added

2.00

Result Qualifier

Result Qualifier

76.44

72.65

Result Qualifier

Unit

mg/L

Unit

mg/L

Unit

mg/L

Unit

mg/L

Unit

mg/L

Unit

mg/L

D

%Rec

D %Rec

D

D

Prepared

97

102

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Method: 410.4 - COD (Continued)

Lab Sample ID: LCS 620-51581/4-A

Matrix: Water

Analysis Batch: 51670

Spike Added Analyte **Chemical Oxygen Demand** 75.0

Sample Sample

Sample Sample

ND

Result Qualifier

MB MB

 $\overline{\mathsf{ND}}$

Result Qualifier

ND

Result Qualifier

Lab Sample ID: 620-28231-2 MS

Matrix: Water Analysis Batch: 51670

Analyte

Chemical Oxygen Demand

Lab Sample ID: 620-28231-2 DU **Matrix: Water**

Analysis Batch: 51670

Analyte Chemical Oxygen Demand

Method: EPA 350.1 - Nitrogen, Ammonia

Lab Sample ID: MB 410-681656/53

Matrix: Water

Analysis Batch: 681656

Analyte

Ammonia as N Lab Sample ID: LCS 410-681656/51

Matrix: Water

Analysis Batch: 681656

Analyte Ammonia as N

Ammonia as N

Lab Sample ID: LCSD 410-681656/52

Matrix: Water

Analysis Batch: 681656

Analyte

Method: SM 2540D - Solids, Total Suspended (TSS)

Lab Sample ID: MB 620-51551/1 **Matrix: Water**

Analysis Batch: 51551

Total Suspended Solids

Result Qualifier ND

MB MB

RL 5 00 Unit mg/L

Prepared

%Rec

101

Analyzed Dil Fac 08/05/25 08:36

Prep Type: Total/NA

Eurofins Rhode Island

Page 15 of 26

Client Sample ID: Lab Control Sample

%Rec

Limits

90 - 110

%Rec

Limits

80 - 120

Client Sample ID: Method Blank

%Rec

Analyzed

08/06/25 10:45

Client Sample ID: CS-001

Client Sample ID: CS-001

Prep Type: Total/NA

Prep Type: Total/NA

Prep Batch: 51581

RPD

NC

Prep Type: Total/NA

Prep Batch: 51581

Prep Type: Total/NA

Prep Batch: 51581

RPD

Limit

20

Client Sample ID: Lab Control Sample

Dil Fac

Prep Type: Total/NA

Limits 90 - 110

Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

RPD

RPD Limit 90 - 110 15

Client Sample ID: Method Blank

8/7/2025

Client: Roux Associates Inc Job ID: 620-28231-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Method: SM 2540D - Solids, Total Suspended (TSS) (Continued)

Lab Sample ID: LCS 620-51551/2

Matrix: Water

Client Sample ID: Lab Control Sample
Prep Type: Total/NA

Matrix: Water Analysis Batch: 51551

Spike LCS LCS %Rec
Analyte Added Result Qualifier Unit D %Rec Limits

Total Suspended Solids

Lab Sample ID: 620-28231-2 DU Client Sample ID: CS-001

Matrix: Water Prep Type: Total/NA

Analysis Batch: 51551

Sample Sample DU DU RPD
Analyte Result Qualifier Result Qualifier Unit D RPD Limit

Total Suspended Solids ND ND mg/L NC 5

2

3

4

6

_

10

12

13

-

QC Association Summary

Client: Roux Associates Inc Job ID: 620-28231-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

GC/MS VOA

Analysis Batch: 51567

Lab Sample ID 620-28231-1	Client Sample ID Aquip-INF	Prep Type Total/NA	Matrix Water	Method 624.1	Prep Batch
620-28231-2	CS-001	Total/NA	Water	624.1	
MB 620-51567/7	Method Blank	Total/NA	Water	624.1	
LCS 620-51567/4	Lab Control Sample	Total/NA	Water	624.1	
LCSD 620-51567/5	Lab Control Sample Dup	Total/NA	Water	624.1	

GC/MS Semi VOA

Analysis Batch: 51557

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
MB 620-51601/1-A	Method Blank	Total/NA	Water	625.1	51601
LCS 620-51601/2-A	Lab Control Sample	Total/NA	Water	625.1	51601
LCSD 620-51601/3-A	Lab Control Sample Dup	Total/NA	Water	625.1	51601

Analysis Batch: 51591

Lab Sample ID 620-28231-1	Client Sample ID Aquip-INF	Prep Type Total/NA	Matrix Water	Method 625.1 SIM	Prep Batch 51601
620-28231-2	CS-001	Total/NA	Water	625.1 SIM	51601
MB 620-51601/1-A	Method Blank	Total/NA	Water	625.1 SIM	51601
LCS 620-51601/4-A	Lab Control Sample	Total/NA	Water	625.1 SIM	51601

Prep Batch: 51601

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-28231-1	Aquip-INF	Total/NA	Water	625	
620-28231-2	CS-001	Total/NA	Water	625	
MB 620-51601/1-A	Method Blank	Total/NA	Water	625	
LCS 620-51601/2-A	Lab Control Sample	Total/NA	Water	625	
LCS 620-51601/4-A	Lab Control Sample	Total/NA	Water	625	
LCSD 620-51601/3-A	Lab Control Sample Dup	Total/NA	Water	625	

Analysis Batch: 51653

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-28231-2	CS-001	Total/NA	Water	625.1	51601

Metals

Prep Batch: 51542

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-28231-1	Aquip-INF	Total/NA	Water	200.8	
620-28231-2	CS-001	Total/NA	Water	200.8	
MB 620-51542/1-A	Method Blank	Total/NA	Water	200.8	
LCS 620-51542/2-A	Lab Control Sample	Total/NA	Water	200.8	

Analysis Batch: 51612

Lab Sample ID 620-28231-1	Client Sample ID Aquip-INF	Prep Type Total/NA	Matrix Water	Method 200.8	Prep Batch 51542
620-28231-2	CS-001	Total/NA	Water	200.8	51542
MB 620-51542/1-A	Method Blank	Total/NA	Water	200.8	51542
LCS 620-51542/2-A	Lab Control Sample	Total/NA	Water	200.8	51542

Eurofins Rhode Island

Page 17 of 26

3

4

6

9

11

14

QC Association Summary

Client: Roux Associates Inc Job ID: 620-28231-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

General Chemistry

Analysis Batch: 51551

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-28231-1	Aquip-INF	Total/NA	Water	SM 2540D	
620-28231-2	CS-001	Total/NA	Water	SM 2540D	
MB 620-51551/1	Method Blank	Total/NA	Water	SM 2540D	
LCS 620-51551/2	Lab Control Sample	Total/NA	Water	SM 2540D	
620-28231-2 DU	CS-001	Total/NA	Water	SM 2540D	

Prep Batch: 51581

Lab Sample ID 620-28231-2	Client Sample ID CS-001	Prep Type Total/NA	Matrix Water	Method 410.4	Prep Batch
MB 620-51581/3-A	Method Blank	Total/NA	Water	410.4	
LCS 620-51581/4-A	Lab Control Sample	Total/NA	Water	410.4	
620-28231-2 MS	CS-001	Total/NA	Water	410.4	
620-28231-2 DU	CS-001	Total/NA	Water	410.4	

Prep Batch: 51596

Lab Sample ID 620-28231-2	Client Sample ID CS-001	Prep Type Total/NA	Matrix Water	Method 1664B	Prep Batch
MB 620-51596/1-A	Method Blank	Total/NA	Water	1664B	
LCS 620-51596/2-A	Lab Control Sample	Total/NA	Water	1664B	
LCSD 620-51596/3-A	Lab Control Sample Dup	Total/NA	Water	1664B	

Analysis Batch: 51613

Lab Sample ID 620-28231-2	Client Sample ID CS-001	Prep Type Total/NA	Matrix Water	Method 1664B	Prep Batch 51596
MB 620-51596/1-A	Method Blank	Total/NA	Water	1664B	51596
LCS 620-51596/2-A	Lab Control Sample	Total/NA	Water	1664B	51596
LCSD 620-51596/3-A	Lab Control Sample Dup	Total/NA	Water	1664B	51596

Analysis Batch: 51618

Lab Sample ID 620-28231-2	Client Sample ID CS-001	Prep Type Total/NA	Matrix Water	Method 180.1	Prep Batch
MB 620-51618/8	Method Blank	Total/NA	Water	180.1	
LCS 620-51618/9	Lab Control Sample	Total/NA	Water	180.1	

Analysis Batch: 51670

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-28231-2	CS-001	Total/NA	Water	410.4	51581
MB 620-51581/3-A	Method Blank	Total/NA	Water	410.4	51581
LCS 620-51581/4-A	Lab Control Sample	Total/NA	Water	410.4	51581
620-28231-2 MS	CS-001	Total/NA	Water	410.4	51581
620-28231-2 DU	CS-001	Total/NA	Water	410.4	51581

Analysis Batch: 681656

Lab Sample ID 620-28231-1	Client Sample ID Aquip-INF	Prep Type Total/NA	Matrix Water	Method EPA 350.1	Prep Batch
620-28231-2	CS-001	Total/NA	Water	EPA 350.1	
MB 410-681656/53	Method Blank	Total/NA	Water	EPA 350.1	
LCS 410-681656/51	Lab Control Sample	Total/NA	Water	EPA 350.1	
LCSD 410-681656/52	Lab Control Sample Dup	Total/NA	Water	EPA 350.1	

Eurofins Rhode Island

8/7/2025

Page 18 of 26

5

3

4

6

9

10

12

IJ

14

Lab Chronicle

Client: Roux Associates Inc Job ID: 620-28231-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Client Sample ID: Aquip-INF

Date Collected: 08/04/25 09:50 Date Received: 08/04/25 15:40

Lab Sample ID: 620-28231-1

Matrix: Water

Matrix: Water

	Batch	Batch		Dilution	Batch			Prepared
Prep Type	Туре	Method	Run	Factor	Number	Analyst	Lab	or Analyzed
Total/NA	Analysis	624.1			51567	CLR	EET RI	08/05/25 16:59
Total/NA	Prep	625			51601	JAC	EET RI	08/05/25 12:58
Total/NA	Analysis	625.1 SIM		1	51591	JS	EET RI	08/05/25 18:30
Total/NA	Prep	200.8			51542	SRC	EET RI	08/04/25 17:23
Total/NA	Analysis	200.8		1	51612	JPC	EET RI	08/05/25 15:09
Total/NA	Analysis	EPA 350.1		1	681656	JCG7	ELLE	08/06/25 11:07
Total/NA	Analysis	SM 2540D		1	51551	DJW	EET RI	08/05/25 08:36

Lab Sample ID: 620-28231-2 Client Sample ID: CS-001

Date Collected: 08/04/25 09:45 Date Received: 08/04/25 15:40

_	Batch	Batch		Dilution	Batch			Prepared
Prep Type	Type	Method	Run	Factor	Number	Analyst	Lab	or Analyzed
Total/NA	Analysis	624.1			51567	CLR	EET RI	08/05/25 17:27
Total/NA	Prep	625			51601	JAC	EET RI	08/05/25 12:58
Total/NA	Analysis	625.1		1	51653	JS	EET RI	08/06/25 13:39
Total/NA	Prep	625			51601	JAC	EET RI	08/05/25 12:58
Total/NA	Analysis	625.1 SIM		1	51591	JS	EET RI	08/05/25 18:58
Total/NA	Prep	200.8			51542	SRC	EET RI	08/04/25 17:23
Total/NA	Analysis	200.8		1	51612	JPC	EET RI	08/05/25 15:12
Total/NA	Prep	1664B			51596	AZD	EET RI	08/05/25 12:28
Total/NA	Analysis	1664B		1	51613	AZD	EET RI	08/05/25 14:48
Total/NA	Analysis	180.1		1	51618	MJH	EET RI	08/05/25 14:59
Total/NA	Prep	410.4			51581	DJW	EET RI	08/05/25 10:26
Total/NA	Analysis	410.4		1	51670	DJW	EET RI	08/06/25 10:58
Total/NA	Analysis	EPA 350.1		1	681656	JCG7	ELLE	08/06/25 11:10
Total/NA	Analysis	SM 2540D		1	51551	DJW	EET RI	08/05/25 08:36

Laboratory References:

EET RI = Eurofins Rhode Island, 646 Camp Ave, North Kingstown, RI 02852, TEL (413)789-9018

ELLE = Eurofins Lancaster Laboratories Environment Testing, LLC, 2425 New Holland Pike, Lancaster, PA 17601, TEL (717)656-2300

Accreditation/Certification Summary

Client: Roux Associates Inc Job ID: 620-28231-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Laboratory: Eurofins Rhode Island

Unless otherwise noted, all analytes for this laboratory were covered under each accreditation/certification below.

Authority	Progr	ram	Identification Number	Expiration Date
assachusetts	State		M-RI907	06-30-26
	s are included in this repo		not certified by the governing authori	ty. This list may include analytes
Analysis Method	Prep Method	Matrix	Analyte	
180.1		Water	Turbidity	
625.1 SIM	625	Water	Benzo[a]anthracene	
625.1 SIM	625	Water	Benzo[a]pyrene	
625.1 SIM	625	Water	Benzo[b]fluoranthene	
625.1 SIM	625	Water	Benzo[k]fluoranthene	
625.1 SIM	625	Water	Chrysene	
625.1 SIM	625	Water	Dibenz(a,h)anthracene	
625.1 SIM	625	Water	Indeno[1,2,3-cd]pyrene	
625.1 SIM	625	Water	Naphthalene	

Laboratory: Eurofins Lancaster Laboratories Environment Testing, LLC

The accreditations/certifications listed below are applicable to this report.

Authority	Program	Identification Number	Expiration Date
Massachusetts	State	M-PA009	06-30-26

-

E

7

. .

46

13

14

Method Summary

Client: Roux Associates Inc Job ID: 620-28231-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Method	Method Description	Protocol	Laboratory
624.1	Volatile Organic Compounds (GC/MS)	EPA	EET RI
25.1	Semivolatile Organic Compounds (GC/MS)	EPA	EET RI
25.1 SIM	Semivolatile Organic Compounds GC/MS (SIM)	EPA	EET RI
8.00	Metals (ICP/MS)	EPA	EET RI
664B	HEM and SGT-HEM	1664B	EET RI
80.1	Turbidity, Nephelometric	EPA	EET RI
10.4	COD	EPA	EET RI
PA 350.1	Nitrogen, Ammonia	EPA	ELLE
M 2540D	Solids, Total Suspended (TSS)	SM	EET RI
664B	HEM and SGT-HEM (Aqueous)	1664B	EET RI
8.00	Preparation, Total Metals	EPA	EET RI
10.4	COD	EPA	EET RI
25	Liquid-Liquid Extraction	EPA	EET RI

Protocol References:

1664B = EPA-821-98-002

EPA = US Environmental Protection Agency

SM = "Standard Methods For The Examination Of Water And Wastewater"

Laboratory References:

EET RI = Eurofins Rhode Island, 646 Camp Ave, North Kingstown, RI 02852, TEL (413)789-9018

ELLE = Eurofins Lancaster Laboratories Environment Testing, LLC, 2425 New Holland Pike, Lancaster, PA 17601, TEL (717)656-2300

3

4

6

9

10

12

13

14

Case 1:24-cv-11766-RGS Document 51-1 Filed 08/22/25 Page 51 of 59 Sample Summary

Client: Roux Associates Inc Job ID: 620-28231-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Lab Sample ID	Client Sample ID	Matrix	Collected	Received	Sample Origin
620-28231-1	Aquip-INF	Water	08/04/25 09:50	08/04/25 15:40	Massachusetts
620-28231-2	CS-001	Water	08/04/25 09:45	08/04/25 15:40	Massachusetts

Eurofins Rhode Island

_	
=	
2	
*	
ă	
ā	
S	
=	
=	
0	
Ö	
S	
S	
4	
0	
=	
111	
-	
3	
3	
>	
_	
8	
6	
6	
4	
۵,	i
i	
	1
	ı
	۲
_	
ò	
ō	
_	
0	
⋖	
MA 0	
Σ	
n, MA	
am, MA	
vam, MA	
awam, MA	
gawam, MA	
Agawam, MA	
- Agawam, MA	
 Agawam, MA 	
e • Agawam, M	
rive • Agawam, M	
e • Agawam, M	
e • Agawam, M	
e • Agawam, M	
e • Agawam, M	
e • Agawam, M	
e • Agawam, M	
e • Agawam, M	
e • Agawam, M	
e • Agawam, M	
e • Agawam, M	
e • Agawam, M	
e • Agawam, M	
e • Agawam, M	
e • Agawam, M	
e • Agawam, M	
e • Agawam, M	
e • Agawam, M	
e • Agawam, M	
e • Agawam, M	
e • Agawam, M	
e • Agawam, M	
e • Agawam, M	
e • Agawam, M	
e • Agawam, M	
e • Agawam, M	
e • Agawam, M	

Rev. Nov 2016

benzo(b)fluoranthene, and indeno(1,2,3-cd)pyrene 0 05 ug/l., benzo(a)pyrene,and Soil Jar Frozen dibenzo(a,h)anthracene 0 00013 ug/L, benzo(k)fluoranthene 0 013 ug/L, ☐ Broken QA/QC Reporting Notes:
* additional charges may appply Yes C State: MA Minimum Levels (CRLs) required ☐ ASP B* ☐ NJ Full* ☐ Tier IV* Chelsea Sandwich, LLC - Outfall Quarterlies & Treatment System Samples % □ Other State-specific reporting stand 620-28231 COC 48 hr MA DEP MCP CAM Report? CT DPH RCP Report? ☐ Standard ☐ DQA* ☐ ASP A* ☐ NJ Reduced* ☐ Tier II* ☐ DI VOA Frozen All TATs subject to laboratory approval
Min. 24-hr notification needed for rushes
Samples disposed after 30 days unless otherwise instructed. Special Handling: thenderson@rouxinc.com. sbarrientos@rouxinc.com O ireed@rouxinc com, sara walsh@globalp com □Standard TAT - 7 to 10 busmess days Check if chlorinated DIBIT - PIEID □Rush TAT - Date Needed. Refrigerated 7) bləiA - Hq 11 Broadway, Chelsea 1629 0009M002 diethylhaxyl phthalate bulyl benzyl phthalate di-n-octyl phthalate diethyl phthalate dimethyl phthalate di-n-octyl palalate D EQUIS EZEDD (528) setal Phthalates (625) List Preservative Code below က × Chemical Oxygen Demand ო × Condition upon receip! (1.081) (ibidan) × EDD formal Sampler(s) Site Name: Ambient benzo(a)pyrene benzo(a)anlhracene benzo(b)fluoranthene benzo(k)fluoranthene chrysene dibenzo(a h)anthracene indeno(1 2 3-cd)pyrene E-mail to Location *(MIS × Leget PAHs (625.1 7 × Benzene (624.1) 5 D CHAIN OF CUSTODY RECORD ო × (1.03£) N se sinomm/ Temp °C Total Cu, Zn (200.8) × TSS (2540D) 540 # of Plastic ო アファ e-mail invoice to rouxap@rouxinc com Time: Quote # 0 0 # of Clear Glass # of Amber Glass 8/4/25 Date: က 1629 0009M002 slatV AOV To # 6=Ascorbic Acid 5 ₹ × Майтх Roux Type Ø Ø WW=Waste Water Invoice To PONo のとろい BEND Time: 5=NaOH SG=Soul Gas Received by: C=Compsite χ̈. もなたの 14125 4=HNO3 Date: Spectrum Analytical SW=Surface Water A=Indoor/Ambient Aur 3=H2SO4 7=CH3OH 8=NaHSO₄ 9=Detonized Water 10=H₃PO₄ X2= 2=HCI GW=Groundwater Sample ID: Aquip-INF CS-001 200 Summit Drive, Suite 500 SL=Sludge (781)-569-4000 Tom Hendersor Burlington, MA 01803 1=Na₂S2O₃ Relinquished by: 🔅 eurofins Roux Associates G= Grab DW=Drinking Water SO=Soil F=Field Filtered Lab ID: Project Mgr ΧI= Report To 0=01

Eurofins Rhode Island

646 Camp Ave

Chain of Custody Record

104	

- 4	eurofins-	-
**		e

North Kingstown, RI 02852 Phone: 413-789-9018 Fax: 413-506-3830		, iidiii v	oi Ous	touy i	100	.01	u						24						Environm	ent Testing			
Client Information (Sub Contract Lab)	Sampler: N/A	N/A Huntle										N/A):		- 6	COC No: 620-23235.1					
Client Contact: Shipping/Receiving	Phone: N/A	Phone: E-Ma N/A Agn								com			e of Original					Page: Page 1 of 1					
Company:	1865			/yi				quired (IVIE	ssacriu:	seus				Job #:					
Eurofins Lancaster Laboratories Environm				chuse										620-28231-1									
Address:	dress: Due Date Requested: 125 New Holland Pike, , 8/6/2025												4 1	-	- 1	-		Preservation Code	s:				
City:	TAT Requested (da	uml:			- 3			Ar	nalys	IS RE	que	stea		T 1	Tri.		-						
Lancaster	121 Gadranted (co	N/A						1 1							8								
State, Zip: PA, 17601																							
Phone: 717-656-2300(Tel)	PO#: N/A																						
Email:	WO#:				es or No	2									1	ă							
N/A Project Name:	N/A Project #:				- 12	ž										1	5						
Chelsea Sandwich, LLC - Chelsea, MA	62000149 SSOW#:			red Sample (Y	Yes D	e e										ontain	Other;						
N/A	N/A				E	SD	Ĕ										53	N/A					
		Sample	Sample Type (C=comp,	Matrix (W=water, B=solid, O=waste/oil,	d.Filtered	riorm MS/MSD (Yes or No)	350.1Nkrogen, Ammonia										Testal Number						
Sample Identification - Client ID (Lab ID)	Sample Date	Time		BT=Tiseue, A=Air			99											Special Ins	tructions/	Note:			
		><	Preserva	tion Opde:	X	X				100	22 6						X	The second					
Aquip-INF (620-28231-1)	8/4/25	09:50 Eastern	G	Water			х										1						
CS-001 (620-28231-2)	8/4/25	09:45 Eastern	G	Water	Ш		x										1						
					Ш															_			
					Ш	1																	
					Ш						\perp	\perp		\perp	Ш								
					11	\perp					4												
					Ш	\downarrow	_				4	1		_	Ш		emple.						
					\perp	_		\perp			4						40.03						
					Ш												N+76						
Note: Since laboratory accreditations are subject to change, Eurofins Envidoes not currently maintain accreditation in the State of Origin listed above status should be brought to Eurofins Environment Testing Northeast, LLC	e for analysis/tests/matrix bei	ng analyzed, ti	he samples mu	st be shipped	back to	the E	Lurofins	Enviror	nment '	Testing	Northe	est, LL	C laborate	ory or ott	her instru	uctions	will	be provided. Any cha	if-custody. If inges to accre	the laborator, editation			
Possible Hazard Identification					ŀ	Sam					ay be							d longer than 1 r	-				
Unconfirmed	D-1 D-1	11 5 1			_			ım To			-		osal By	Lab		_ AI	rchi	ive For	Months				
Deliverable Requested: I, II, III, IV, Other (specify)	Primary Deliver	able Rank:			ľ	Spec	iai ins	structio	MS/Q	C Red	utrem	ents:											
Empty Kit Relinquished by:		Date:			Tim								Method	of Ship	ment:								
Relinquished by Mathan Jar.	8/4/2S	ale/Time: 753 Comp 8/1/25 753 Comp electrime: Comp 9(5/25 0.330 E			RI		Received by:					Date/Time:					_	5.37	Company				
Relinquished by:	Date/Time: 35/25	- 0.	230	Company	7	R	laceived	d by:						Date	e/Time:				Company	_			
Relinquished by:	Data/Time:			Company		R	lacajved	d by)		1				DO	77.	25		0030	CUC	7			
Custody Seals Intact: Custody Seal No.:						С	ooler T	empera	ture(s)	°C and	Other I	Ramari	18:		(V	7	7	9/2	, \				

8/7/2025

Login Sample Receipt Checklist

Client: Roux Associates Inc Job Number: 620-28231-1

Login Number: 28231 List Source: Eurofins Rhode Island

List Number: 1

Creator: Makhoul, Elie

Creator. Makrioui, Elle		
Question	Answer	Comment
Radioactivity wasn't checked or is = background as measured by a survey meter.</td <td>y N/A</td> <td></td>	y N/A	
The cooler's custody seal, if present, is intact.	N/A	
Sample custody seals, if present, are intact.	N/A	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time (excluding tests with immediate HTs)	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	True	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is <6mm (1/4").	True	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	
Residual Chlorine Checked.	N/A	

Eurofins Rhode Island

Login Sample Receipt Checklist

Client: Roux Associates Inc Job Number: 620-28231-1

Login Number: 28231 List Source: Eurofins Lancaster Laboratories Environment Testing, LLC List Number: 2 List Creation: 08/05/25 05:58 AM

Creator: Renner, Melissa

Question	Answer	Comment
The cooler's custody seal is intact.	True	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature acceptable, where thermal pres is required(=6C, not frozen).</td <td>True</td> <td></td>	True	
Cooler Temperature is recorded.	True	
WV:Container Temp acceptable, where thermal pres is required (=6C, not frozen).</td <td>N/A</td> <td></td>	N/A	
WV: Container Temperature is recorded.	N/A	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
There are no discrepancies between the containers received and the COC.	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
There is sufficient vol. for all requested analyses.	True	
ls the Field Sampler's name present on COC?	False	Received project as a subcontract.
Sample custody seals are intact.	N/A	Not present.
VOA sample vials do not have headspace >6mm in diameter (none, if from	N/A	

2

3

4

5

7

9

44

12

a

WV)?

EXHIBIT S

Table 1. CS-001 Treatment System Start-up Analytical Results NPDES Permit No. MA0003280 Chelsea Sandwich LLC, Chelsea, MA 02150

DRAFT

Week Number		er			1		2		3			1	4 - Rea	nalysis	5		6		7	7	8 6/16/2025						
		Sample Dat	te	4/22/	2025	5/2/2	025	5/6/2	025	5/13/	2025	5/20/	2025	5/20/	/2025	5/28/2	025	6/2/2025		6/9/2025			7/2/2025		8/4/2025		
		Sample ID		AQUIP-INF	CS-001	AQUIP-INF	CS-001	AQUIP-INF	CS-001	AQUIP-INF	CS-001	AQUIP-INF	CS-001	AQUIP-INF	CS-001	AQUIP-INF	CS-001	AQUIP-INF	CS-001								
Analyte	Permit Daily Maximum Limitation	Permit Monthly Average Limitation	Unit																								
Benzene	5		μg/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	NA	NA	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Benzo(a)anthracene		0.0013	μg/L	0.0798	< 0.0481	0.0904	< 0.0481	< 0.0463	< 0.0463	< 0.0463	< 0.0463	< 0.0463	< 0.0463	NA	NA		< 0.0481	< 0.0463	< 0.0472	< 0.0463	< 0.0463	< 0.0446	< 0.0500	< 0.0463	< 0.0463	< 0.05	< 0.0463
Benzo(a)pyrene			μg/L	< 0.050	< 0.0481	< 0.0481	< 0.0481		< 0.0463	< 0.0463	< 0.0463	< 0.0463	< 0.0463	NA	NA		< 0.0481	< 0.0463	< 0.0472	< 0.0463	< 0.0463	< 0.0446	< 0.0500	< 0.0463	< 0.0463	< 0.05	< 0.0463
Benzo(b)fluoranthene		0.0013	μg/L	0.0613	< 0.0481	0.0752	< 0.0481	< 0.0463	< 0.0463	< 0.0463	< 0.0463	< 0.0463	< 0.0463	NA NA	NA	-	< 0.0481	< 0.0463	< 0.0472	< 0.0463	< 0.0463	< 0.0446	< 0.0500	< 0.0463	< 0.0463	< 0.05	< 0.0463
Benzo(k)fluoranthene		0.013	μg/L	< 0.050	< 0.0481	< 0.0481	< 0.0481	< 0.0463	< 0.0463	< 0.0463	< 0.0463	< 0.0463	< 0.0463	NA	NA		< 0.0481	< 0.0463	< 0.0472	< 0.0463	< 0.0463	< 0.0446	< 0.0500	< 0.0463	< 0.0463	< 0.05	< 0.0463
Chrysene		0.13	μg/L	< 0.050	< 0.0481	< 0.0481	< 0.0481		< 0.0463	< 0.0463	< 0.0463	< 0.0463	< 0.0463	NA	NA		< 0.0481		< 0.0472	< 0.0463	< 0.0463	< 0.0446	< 0.0500	< 0.0463	< 0.0463	< 0.05	< 0.0463
Dibenzo(a,h)anthracene		0.00013	μg/L	< 0.050	< 0.0481	< 0.0481	< 0.0481	< 0.0463	< 0.0463	< 0.0463	< 0.0463	< 0.0463	< 0.0463	NA	NA		< 0.0481		< 0.0472	< 0.0463	< 0.0463	< 0.0446	< 0.0500	< 0.0463	< 0.0463	< 0.05	< 0.0463
Indeno(1,2,3-cd)pyrene		0.0013	μg/L	< 0.050	< 0.0481	< 0.0481	< 0.0481	< 0.0463	< 0.0463	< 0.0463	< 0.0463	< 0.0463	< 0.0463	NA	NA	-	< 0.0481	< 0.0463	< 0.0472	< 0.0463	< 0.0463	< 0.0446	< 0.0500	< 0.0463	< 0.0463	< 0.05	< 0.0463
Naphthalene	20		µg/L	< 0.050	< 0.0481	NA	< 0.0481	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	< 0.0472	NA	NA	NA	NA	< 0.0463	< 0.0463	< 0.05	< 0.0463
Total Copper	5.8		μg/L	10.5	< 4.0	19.2	< 4.0	7.39	< 4.0	8.49	< 4.0	5.4	< 4.0	5.82	< 4.0	7.41 F1	< 4.0	4.95	< 4.0	9.7	< 4.0	5.5	< 4.0	13.3	< 4.0	5.94	< 4.0
Total Zinc	95.1		μg/L	80	< 16.0	153	< 16.0	38.1	< 16.0	< 16.0	< 16.0	19.7	19.7	21.1	16.1	50.3 F1	16.8	46.8	16.2	69.9	< 16.0	34.3	30.3	34.8	22.4	27.1	80.4
Total Ammonia as Nitrogen	1.8		mg/L	NA	0.308	0.583	0.192	< 0.1	0.143	< 0.1	< 0.1	0.415	0.19	NA	NA	0.142	< 0.1	0.281	0.153	0.251	< 0.1	0.394	0.161	1.02	0.184	0.315	< 0.10
Total Suspended Solids	100	30	mg/L	< 20.0	< 5.0	24.5	< 5.0	< 10.0	< 5.0	< 10.0	5	< 5.0	< 5.0	NA	NA	< 5.0	< 5.0	5.5	< 5.0	5.5	< 5.0	< 10.0	< 5.0	15	< 5.0	< 10.0	< 5.0
Total Residual Chlorine	30		μg/L	10	10	20	10	10	0	20	0	20	0	NA	NA	10	0	10	0	10	0	10	0	10	0	20	20
pH	6.5	- 8.5	SU	6.9	7.3	6.7	6.9	7.1	7.5	6.8	6.8	7	6.7	NA	NA	6.7	6.6	6.7	6.7	6.8	6.7	6.8	6.8	6.8	6.7	6.8	7.1
Oil & Grease	15		mg/L	< 1.9	< 1.9	NA	< 2.1	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	< 2.0	NA	NA	NA	NA	NA	< 1.9 *-	NA	< 2.0
Turbidity			NTU	0.45	0.9	NA	15	NA	< 0.3	NA	NA	NA	NA	NA	NA	NA	NA	NA	1.4	NA	1.1	NA	NA	NA	0.4	NA	1.9
Chemical Oxygen Demand			mg/L	NA	< 10.0	NA	< 10.0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	< 10.0	NA	NA	NA	NA	NA	< 10.0	NA	< 10.0
Total cyanide	5		μg/L	2.0 J	< 1.0	NA	< 1.0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	2.0 J	NA	NA	NA	NA	NA	< 1.0	NA	< 1.0
Fecal coliform			MPN/100ml	9.79	2.02	NA	2.02	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	54.75	NA	NA	NA	NA	NA	365.4	NA	50.39
Enterococcus			MPN/100ml	74.39	42.57	NA	61.98	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	9.6	NA	NA	NA	NA	NA	9.69	NA	81.62

Notes:

F1, indicates that the MS/MSD recovery exceeded control limits

Analytes shaded in yellow indicates a Consent Order required analyte --, indicates there is no value listed in NPDES Permit #MA0003280

<, indicates analyte not detected above laboratory reporting limit; value shown is laboratory reporting limit.

For the Polycyclic Aromatic Hydrocarbons (PAHs) listed above, the Permit specified minimum level of laboratory analysis is 0.5 ug/L, which is greater than the monthly average Permit limit.

Bold, indicates analyte detected above laboratory reporting limit

Concentration above Permit Daily Maximum Limitation and/or the Permit Monthly Average Limitation

μg/L, micrograms per liter

J, indicates an Estimated value. The Target analyte concentration is below the quantitation limit (RL), but above the Method Detection Limit (MDL)

*- indicates LCS and/or LCSD is outside the acceptance limits, low biased

mg/L, milligrams per liter

MPN, Most probable number of microorganism per 100 milliliters (mL) of sample

NA, indicates the analyte was not analyzed for

NTU, Nephelometric Turbidity Units

SU, Standard units

The sample collected on 5/20/25 was reanalyzed for total copper and total zinc, due to the initial analytical results appearing to indicate that the total zinc sample result was reported twice for the AQUIP-INF and CS-001.

Due to a laboratory error during the analysis of the fecal coliform sample collected on 7/2/25, an additional sample from CS-001 for fecal coliform analysis was collected on 7/10/25



Page 1 of 1

EXHIBIT T

From: Sara Walsh <sara.walsh@globalp.com>
Sent: Monday, June 30, 2025 10:29 AM

To: Rosenberg, Alex; Little, Shauna; King, Susannah (DEP); Coniaris, Catherine (DEP) **Cc:** Steve Charron; Tom Keefe; Matthew Snell; Matthew Connolly; Thomas Henderson

Subject: CWA-AO-R01-FY24-46-Global Consent Order Amended SWPPP **Attachments:** Chelsea Sandwich LLC - Chelsea Terminal SWPPP 06.30.2025.pdf

All,

As required by paragraph IV.4 of Administrative Order of Consent CWA-AO-R01-FY24-46, Global Companies LLC and Chelsea Sandwich LLC (collectively "Global") submit the attached amended Stormwater Pollution Prevention Plan (SWPPP) for the Chelsea Sandwich Facility reflecting the installation of the Newterra Treatment System.

If you have any questions, please contact Tom Keefe at (781)398-4132.

Sara Walsh

Environmental Compliance Specialist

Cell: 781-382-8710

800 South Street, Suite 500 Waltham, MA 02453

GLOBAL PARTNERS

Putting Our Energy to Work